

Policy Statement

The International School of Ulm/Neu-Ulm (ISU) fully recognizes its responsibilities for child protection and its role in ensuring that each and every student can learn in a safe and non-threatening environment.

ISU commits to the values inherent in the United Nations Convention on the Rights of the Child (UNCRC). The UNCRC is a legally-binding international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities.

ISU believes that the welfare of children is of paramount importance and, as responsible adults, we have the task of safeguarding and promoting the welfare of children and ensuring that they are protected from harm.

In Bavaria, the cooperation between schools and the "Jugendamt" is embodied in the following laws:

- Eighth Book of the Social Code Children and Youth Services Act (Chapter One - General provisions §§ 1 - 10) § 8a - Protection Order for Child Endangerment).
- ChildProtection1GermanSchoolLaw-Sec42, Paragraph 6.
- GDPR

ISU works to provide *Safer Culture* in our community using preventative as well as responsive safeguarding practice, policies and procedures. This concept is detailed herein.

As such, all staff and volunteers have a duty to ensure that if there are any concerns relating to the welfare and/or safety of a child at ISU, the procedures contained within this document are followed. This duty applies to the welfare and/or safety of children **at all times**, for example - but not limited to - normal school activities, extra-curricular programmes and trips as well as at home.

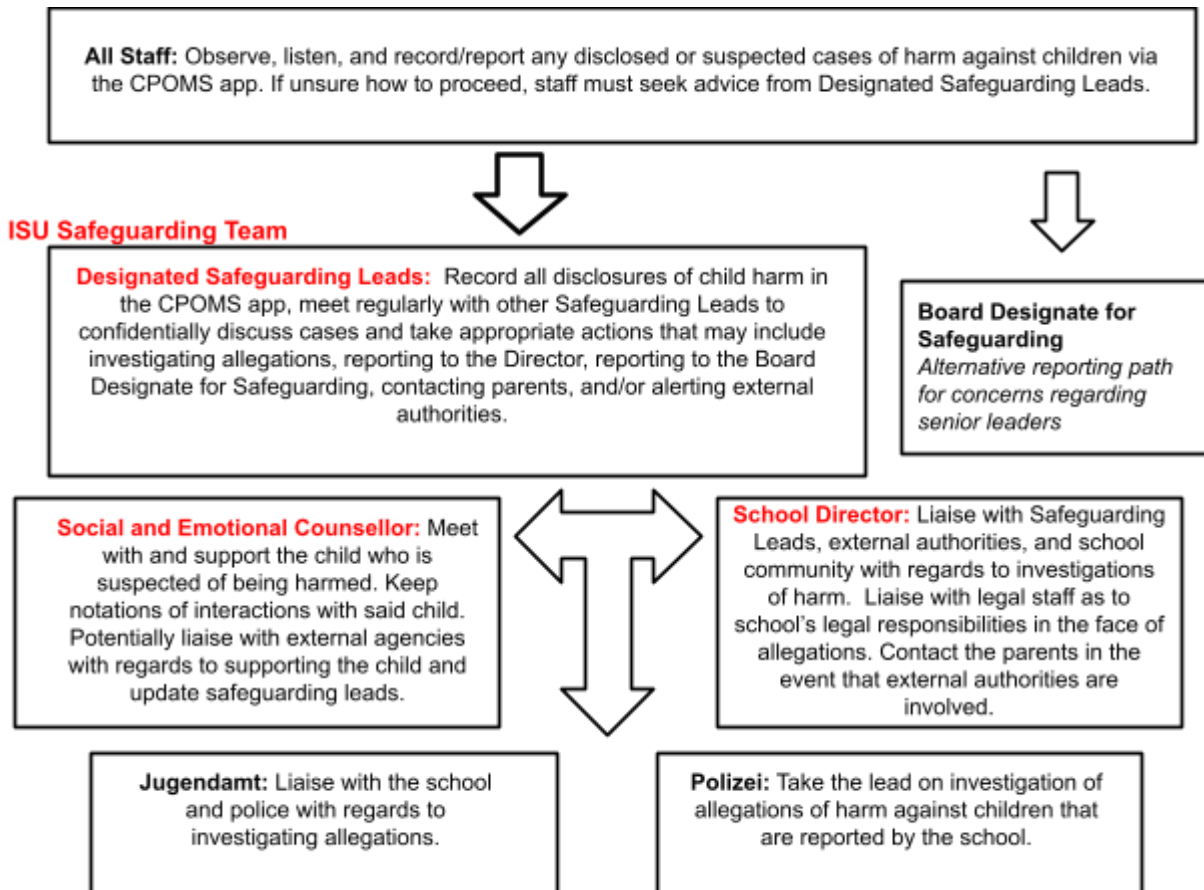
Procedures

Designated Safeguarding Lead

To help ensure that the safety and rights of all children are protected, the Director designates members of staff to serve as the school's **Designated Safeguarding Leads**. Their responsibilities are as follows:

- Coordinate communications with the ISU Safeguarding Team
- Develop, update and ensure compliance of a protocol for reporting possible safety issues for children,
- Participation in regular child protection training and ensure that all staff and volunteers know how to recognize and report any concerns.
- Training of Staff on systems and procedures including delivering PD and training.
- Being the point of contact for staff who have concerns or information that a child may currently be or may have been the victim of physical or emotional abuse
- Report any concerns to the ISU Director. The Director, if appropriate, may inform the school counsellor and/or the respective division principal. After consultation with the Director, a member of the Safeguarding Team may contact the appropriate authorities (i.e. Schulamt School Psychologist and/or Jugendamt) and follow the procedures set down by both the local and Bavarian authorities.
- Provide summary information to the Director and/or respective Principals regarding the number, nature and outcomes of referrals made.

Child Safeguarding - Flow Chart



Measures of Prevention

The International School of Ulm/Neu-Ulm (ISU) is committed to maintaining a safe learning environment. ISU also works to promote *Safer Culture* which includes:

- Preventative as well as responsive safeguarding practice
- Policies and procedures
- Recognising dangerous cultures
- Providing appropriate training
- Safeguarding, professional boundaries, code of conduct, e-safety
- Upskilling your workforce to recognise negative safeguarding behaviours
- Communication and openness
- Whistleblowing
- Putting children first
- Culture of vigilance

Other measures integrated into school procedures:

- All potential employees must provide at least three (3) references and are required to submit a police clearance or background check from their previous country of residence.
- All employees and volunteers working with the school must be familiar with the Child Protection Policy and its implication within the school.
- ISU will seek out and provide training opportunities for faculty and staff to ensure that they are aware of the signs and symptoms of neglect or physical, emotional, or sexual abuse.

Faculty and Staff, External Services, and Volunteer Vetting

- All external services (catering, cleaning, etc.) working at ISU have contractual obligations from the employer to provide police clearance checks.
- Police clearance checks must show a minimum of six months validity.
- Employee references must be obtained for every employee
- Job recruitment fairs (e.g. Search Associates) hold confidential references for candidates. These must be supported with a telephone reference given the time lapsed between reference and appointment.
- The school should check the validity of the references supplied.
- All private freelancers (coaches, music instructors, mother-tongue teachers, ASAP volunteers, Parent Partners, etc.) and volunteers working with children either individually or in a group must also adhere to this procedure, be properly vetted and have police clearance checks.

School Trips

- For the purpose of this document, “chaperone” includes teachers, other staff members and volunteers.
- All staff involved with an excursion should be familiar with the need to prevent child abuse, to understand signs that a child is at risk or has been harmed, and to respond appropriately if he or she has concerns.
- Students should be briefed and encouraged to report any breaches on these procedures to the Designated Safeguarding Leads
- Students should be made aware of how to stay safe when being housed by guest families.
- The minimum required student to staff ratio should be known and adhered to for all trips.
- Start of trip / end of trip is defined as departure from and return to ISU, to include being picked up by parents.
- During a trip and wherever possible, a minimum of three students should remain together at all times.
- It is expected that both male and female chaperones will be present on overnight trips involving both boys and girls.

Emergencies/accidents/injuries:

- ISU Emergency Guidelines must be followed on all school trips.
- Wherever possible, use a +1 rule, meaning if a group needs to split up (i.e. an injured student needs to go to the hospital), always have an extra adult or student go along.

Training

All faculty and staff will receive Child Protection training as part of their induction into the school. This training will be updated at least annually by the Safeguarding team.

Categories of Abuse

Through day-to-day contact with pupils and work with families, both teaching and non-teaching staff members have a critical role to play in noticing indicators of possible physical or emotional abuse or neglect. When indicators of such are noticed, the teacher or staff member has an obligation to report their observations via the CPOMS app. If unsure how to proceed, staff must seek advice from Designated Safeguarding Leads.

Evidence of abuse can include (but is not limited to):

Physical Abuse: Non-accidental injuries, bruising, burns, fractures, etc. Indicators may include:

- Obvious signs of injury,
- Injuries which are unusual or unexplained,
- Injuries which, while explained, are frequent.

Neglect: The chronic inattention to physical or emotional needs Indicators may include:

- Dirty, unkempt appearance,
- Lack of focus, developmental delays,
- Low self-esteem,
- Hunger.

Sexual Abuse: The involvement of children or young people in sexual activity. Indicators may include:

- Extreme variations in behaviour,
- Sexualized language, behaviour or play,
- Indirect disclosure through play, drawing or written work.

Emotional Abuse: Persistent, emotional mistreatment, such as ridiculing or the withholding of love, affection or approval.

Indicators may include:

- Low self-esteem, unhappiness, melancholy, fear, distress or anxiety,
- Attention seeking behaviour,
- Emotional, developmental delay.

Protocols: Incident Reporting, Record Keeping, Confidentiality and Photography

All faculty and staff have a duty to be vigilant to the indicators of abuse and neglect, and to refer any and all concerns using the CPOMS platform. The Safeguarding Team will then be automatically alerted and discuss how to proceed and what actions should be taken, adding these actions onto CPOMS.

During investigations, if deemed necessary, the child's safety must be ensured, parents notified if part of the agreed course of action, and anonymity of those involved should be a priority. Any suspicions and investigations will be kept strictly confidential, shared only with those who need to know. In the case of an emergency, where there is a credible threat to the child's safety and wellbeing, the Child Safety Plan will be put into place by the Safeguarding Team.

ISU operates in accordance with German law and best practise both locally and within the international school community. Confidential records are kept on children about whom the school has documented concerns and these records are shared with the appropriate authorities when the Safeguarding Team identifies that the child is in danger or that their physical and/or emotional needs are not being met. These files are securely stored on CPOMS, protected by two factor authentication.

If a report is made to the Jugendamt or the Schulamt's School Psychologist, the school will follow the recommendation of the authorities as to what, if any, information should be shared with the family or others.

The Safeguarding Team will provide support and make any necessary referrals to Schulamt's School Psychologist or to the Jugendamt.

Guidance for staff on how to act, listen to and record concerns

Staff and volunteers should feel confident about challenging the behaviour of others and voicing concerns.

They should also know who to contact if they feel unable to report an incident within their organisation.

Staff should NOT attempt to investigate the matter, but note the facts and record this information in CPOMS.

The following constitutes a safeguarding allegation if it is claimed that a staff member or volunteer has:

- behaved in a way that has harmed, 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 they may pose a risk of harm to children
- behaved in a way that indicates they may not be suitable to work with children.

Record keeping

It is important to keep a clear and comprehensive summary of:

- all allegations that have been made
- details of how allegations have been followed up and investigated
- outcomes of the allegation and actions taken.

NOTE: It is important to advise the student that the information CANNOT be kept confidential by you when you believe they are at risk.

Good practice advice for listening to disclosures / concerns

DO	DON'T
<ul style="list-style-type: none"> <input type="checkbox"/> Be accessible, caring and receptive <input type="checkbox"/> Listen carefully <input type="checkbox"/> Take it seriously <input type="checkbox"/> Reassure them that they were right to tell <input type="checkbox"/> Say what will happen next <input type="checkbox"/> Consult immediately with Designated Safeguarding Lead <input type="checkbox"/> Make a careful record of what was said 	<ul style="list-style-type: none"> <input type="checkbox"/> React strongly <input type="checkbox"/> Jump to conclusions especially about the abuser <input type="checkbox"/> Speculate or accuse anybody <input type="checkbox"/> Tell them you will keep it secret <input type="checkbox"/> Ask leading questions <input type="checkbox"/> Make promises you cannot keep <input type="checkbox"/> Stop them from speaking freely <input type="checkbox"/> Tell them to stop talking so you can go and fetch the Designated Safeguarding Lead

Make an accurate record of:

- The date and time of the incident/disclosure;
- The date and time of the report;
- The name and role of the person to whom the concern was originally reported and their contact details;
- The name and role of the person making the report (if different to the above) and;
 - their contact details;
 - The names of all parties who were involved in the incident,
 - including any witnesses to an event;
- What was said or done and by whom;
- Any action taken to look into the matter;
- Any further action taken (such as a referral being made); and the reasons why the organisation decided not to refer those concerns to a statutory agency (if relevant).
- Make sure the report is factual. Any interpretation or inference drawn from what was observed, said or alleged should be clearly recorded as such.

Once a disclosure / concern / allegation has been entered into CPOMS:

- The Safeguarding Team will be automatically alerted to the disclosure / concern / allegation and then meet to decide the appropriate course of action according to the thresholds.
- All child protection records are confidential and shared only on a need to know basis. Records kept on the CPOMS system are only accessible by the Safeguarding Team.

Note: These records form evidence and may be used in the child protection referral as well as any subsequent investigation or legal proceedings. Since they are considered to be evidence they are exempt from open file regulations and do not have to be made available to parents requesting access to a student's file.

Possible outcomes in response to allegations

Substantiated: there is sufficient evidence to prove the allegation;

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Confidentiality

Confidential and personal information about children, families, faculty and staff, or others within the school is confidential and privacy must be respected. The right to confidentiality is superseded by the rights enshrined in the UN convention on the Rights of the Child and the school's obligation to safeguard and promote the welfare of children and ensure that they are protected from harm.

Photography and Filming

ISU aims to protect children when partaking in events and activities, specifically those where photographs and videos may be taken;

We seek to keep children / young people and staff safe by:

- Having a responsibility to promote the welfare of all children and young people and to take; share and use images of children safely.
- **Photographs and videos must only be recorded on school devices / memory cards, NEVER use personal mobile devices.**
- Securing written consent on an annual basis from children and their parents or carers before taking and using a child's image;
- Affording parents and carers the right to decide whether children's images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation;
- Always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children;
- Making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published;
- Removing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them).