



BIS CHILD PROTECTION POLICY

Duty of Care

Child abuse and neglect are of growing concern in schools throughout the world. Child abuse and neglect are violations of a child's human rights and are obstacles to a child's education as well as to their physical, emotional, and social development. Bali Island School (BIS) has an institutional responsibility to protect children. In this role we need to ensure that all children in our care are afforded a safe and secure environment in which to grow and develop, no matter what cultural background they come from. As educators, we have the opportunity to observe and interact with children over time on a daily basis, and are in a unique position to identify children who need help and protection. As such, we have a professional and ethical obligation to identify children who are in need of protection and to take steps to ensure that the child and family avail themselves of the services needed to remedy any situation that constitutes child abuse or neglect.

All faculty and staff at Bali Island School are mandated to report their concerns about the well being of any student. Reporting and follow up of all suspected incidences of child abuse or neglect will proceed in accordance with Standard Operating Procedures linked to this policy. Furthermore, cases of suspected child abuse or neglect may be reported to the appropriate employer, to the respective consulate in Bali, to the appropriate child protection agency in the home country, and/or to local authorities.

Bali Island School will:

- Distribute a condensed version of this policy annually to all parents and applicants.
- Communicate this policy annually to students.
- Provide annual training for all faculty and staff.
- Will make every effort to implement hiring practices to ensure the safety of children.

In the case of a staff member reported as an alleged offender, Bali Island School will conduct a full investigation following a carefully designed course of due process.

Standard Operating Procedures (SOP)

There are three main elements to our child safeguarding policy and procedures:

1. Prevention through the creation of a positive school atmosphere and the teaching and pastoral support offered to students.
2. Protection by following agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to child safeguarding concerns.
3. Support for students who may have been abused. The BIS Child Protection Policy is the responsibility of all BIS Community members including teachers, BIS employees, parents/guardians, drivers and pembantus, activity/food providers, and students.

The development of appropriate procedures and the monitoring of good practice are the responsibilities of the BIS Child Protection Team (CPT).

Head of School – Mr Garth Wyncoll
Primary Principal – Mr Craig Eldred
Secondary Principal – Mr Ross Ferris
School Counselor – Ms Rachael Gerbic
Security Advisor/Student Life – Mr Hamish Sutherland

It is the role of the Head of School to ensure that all of the child safeguarding procedures are followed within the school. If for any reason the HoS is unavailable, the relevant Division Principal will act in their absence. Additionally, it is the role of the Head of School and Principals to ensure that all staff employed, including temporary staff and volunteers within the school, are aware of the school's internal procedures, to advise staff and to offer support to those requiring this.

Should the Head of School decide that the situation is a crisis, s/he will alert the Crisis Management Team of any incidents that need to be referred to external agencies or could otherwise damage the reputation of the school. Refer to separate 'Crisis Management Protocols'.

The role of the Board of Directors is to ensure that the school has an effective policy and to support the school in the fulfillment of this policy. All adults working with or on behalf of students have a "Duty of Care" to report concerns. There are, however, key people within the school organization who have specific responsibilities to assess and evaluate those concerns in accordance with child safeguarding procedures. These people form the BIS Child Protection Team.

Safer Recruitment

It is the school's responsibility to ensure, as far as is practicable, that its employees are suitable people to work with children. BIS has implemented a number of checks during its recruitment process with the aim of ensuring that:

- Candidates with a tendency towards child molestation are deterred from applying to the school.
- Candidates who have a criminal record or about whom there have been some concerns about their suitability to work with children are not offered a position.
- Successful candidates fully understand their responsibilities towards Child Protection while employed at the school.
- BIS maintains appropriate records that might be required in a possible future investigation or inquiry.

BIS will work with the Recruitment Agencies (ISS, Search and CIS) to ensure that the reference checks and background screening undertaken by such agencies compliments BIS's own recruitment protocols. Background checks will be carried out for all Indonesian staff and for those expatriate staff who are not able to provide a police clearance certificate or there are concerns about the reliability of such certificates.

Employment Records

BIS will maintain the following records in respect of every employee, either in hard copy or digital format:

- Full CV (any gaps in employment accounted for).
- Statement of Suitability by the candidate.
- Reference checks that cover the last two periods of employment.
- Police Reports from Home of Record and Place of last employment.
- Background Check including criminal record, social media search and sex offender clearance by external agency, where appropriate.
- Medical Report.
- Certified copies of education certificates.
- Signed "Acknowledgement of Code of Conduct".
- Certificate of Child Safeguarding training.

BIS's Safer Recruitment Protocols are summarized below:

- Application - Candidates are required to sign a "Statement of Suitability" stating that they do not have a criminal record, know of no reason why they should be considered unsuitable to work with children, and giving their consent to a Background Check should they be considered a suitable candidate.
- Interview - At least one member of the interview process will have been trained in Safer Recruitment protocols and will be tasked with asking candidates about their child safeguarding experiences.
- Screening - Job offer will be made conditional on:
 - Satisfactory references from at least two previous employers
 - Full medical screening
 - Police clearance certificate from Home of Record
 - Background checks by an external agency where it is deemed appropriate
- Contractual - Employees will be required to:
 - Sign an Acknowledgement of Code of Conduct with each contract renewal
 - Undergo full Child Safeguarding training as part of their orientation and then every three years thereafter.
- HR Records - BIS will maintain records to ensure compliance in respect of the above for every employee.

Reporting Concerns

"Doing nothing is not an option."

All adults have a duty to act if they have a concern about a child's welfare. Abuse can take many forms. Frequently both victims and perpetrators work hard to conceal that abuse is taking place. A concern may just be a "gut reaction" to something heard or observed which doesn't feel right. It may be more specific by way of a witnessed event or disclosure.

Whatever the nature of the concern, adults will be expected to:

- Recognize their concern.
- Make a written report by completing a **Record of Concern Form**.
- Pass on their concern to a member of the BIS Child Protection Team within 24 hours. A specific disclosure by a student must be reported before the close of the school day.

Concerns or alerts may be as a result of:

- Observed student behavior (physical, emotional, change in behavior).
- Hearsay (third party disclosure).
- Disclosure (specific report made by a student directly or via a trusted adult).
- Observed adult behavior (breach of Code of Conduct).

Certain students may be the subject of discussion at SST meetings. If the consensus of the SST team is that there is evidence that some of a child's learning or behavioral issues may be due to some form of abuse, then a Record of Concern should be completed and submitted to the Division Principal responsible for that student at the conclusion of the meeting.

Hierarchy of Reporting

Under normal circumstances, a Record of Concern can be given to any member of the CPT, preferably one from the same division as the student about whom there is a concern. Under certain circumstances, however, the report must be made to a person with the appropriate level of authority as follows:

- If the concern involves a member of the faculty or host country staff, the Report of Concern should be made to the Head of School or Division Principal since this may become a disciplinary matter. Where necessary, the identity of the person making a report about another member of staff will remain confidential.
- If the concern involves a visiting student then the Report of Concern should go to a member of the CPT immediately.
- If the concern involves a contractor or external activity provider, then the Report of Concern must be made to the Head of School.
- If the concern involves the Head of School (or a member of the Board of Management) then the report should be made to the Security Advisor.

Handling a Disclosure

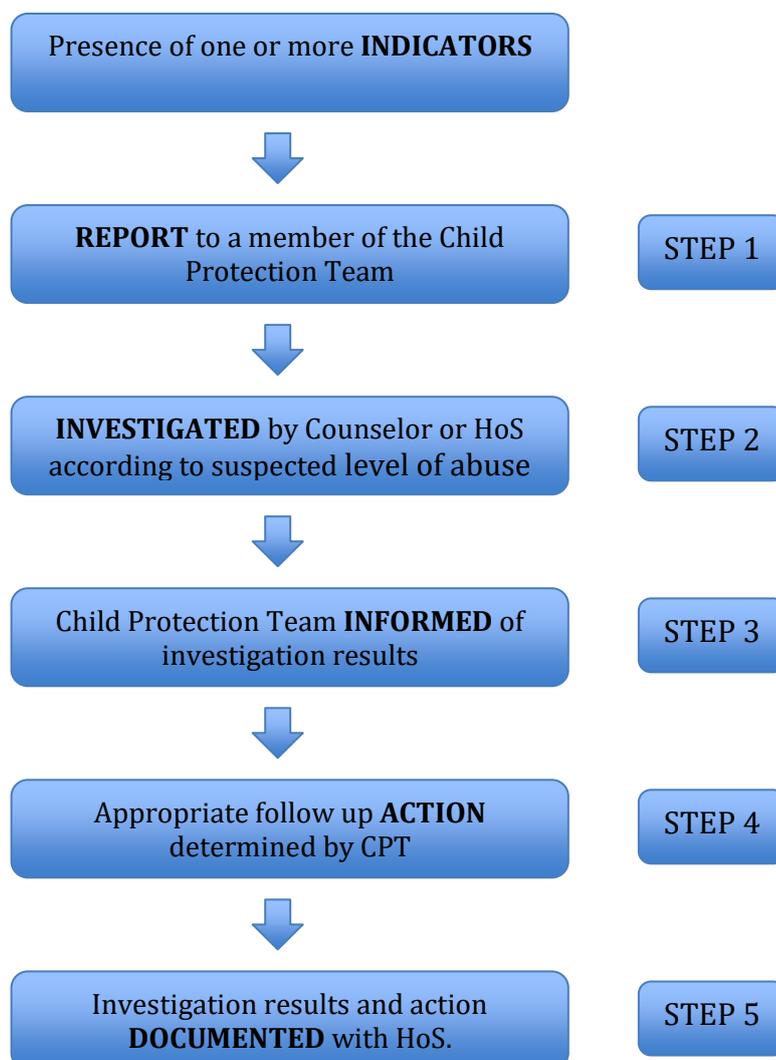
Any adult to whom a student makes a disclosure, must:

- Listen carefully to what is said. Don't interrupt or prompt. Let the child tell the story in his/her own words. Use TED questions:
 - **TELL** me what happened
 - **EXPLAIN** what happened
 - **DESCRIBE** what happened.
- Reassure the child that they are right to speak up. Be calm, attentive, and non-judgmental – don't show any emotion other than sympathy.
- Confidentiality – make it clear that this cannot be kept a secret and that you have a duty to report it to a CPT member or the counselor who is trained to help students in this situation.
- Question the child only if necessary to clarify something that is unclear such as when and where. Do not ask leading questions.

- Action – complete a Report of Concern immediately and contact the CPT before you leave school that day.
- Write it down – use the child's words as far as possible and record anything else that concerned you.

Handling Concerns

Any report will be investigated using the following flow chart:



In order to make an initial assessment, it may be necessary to collect additional information:

- If there is missing information (date, time, location etc.), going back to the original reporter and see if he/she has anything more to add to their report.
- If the incident happened on campus, reviewing any CCTV footage and making sure that any relevant footage is stored separately in a safe location since CCTV data is only stored for 30 days.
- If there are possible signs of physical abuse, a check should be made of medical records kept by the Nurses Office.
- If there were other witnesses to an incident, these witnesses should also be asked to make written statements.

- Obtaining the student's attendance records and academic records to see whether there are changes in patterns, if appropriate.
- A search of the database should be made to see if there have been any other Reports of Concern made about the possible victim, his/her family or the alleged perpetrator.
- Talking with teachers who interact with the student on a regular basis.
- If the incident suggests that a member of staff, coach or contractor is involved, the Head of School should be alerted. Any disciplinary matters relating to a breach in the Code of Conduct will be dealt with by the senior administration.

Based on the data collected, the CPT will make an assessment as to the level of risk to the child's wellbeing and agree a strategy for working with the student and family. Most cases will be "low level" in terms of providing early intervention and giving a student and/or family counseling support.

If the child appears to be "at risk" i.e. having suffered significant abuse that threatens his/her long-term well being (i.e. a situation that cannot be resolved by parental / student education or intervention), then the Head of School may deem it necessary to bring in outside agencies such as:

- External investigator if there is a possible criminal act.
- The Employer or Embassy if the alleged offender is a parent of a student.
- Appropriate Indonesian authorities or other child protection agencies.

The decision to involve outside agencies will be taken by the Head of School in consultation with the Child Protection Team, Board Chair and others as appropriate.

The school will also endeavor to ensure that those staff involved with a case of child abuse receive appropriate counseling and support themselves so that they are able to maintain a highly professional standard of care without undue personal stress.

Record Keeping

Record keeping is essential to the gathering of information and intelligence and detailed notes must be kept of all meetings relating to a Child Protection issue.

The HoS will maintain the detailed, confidential case files relating to the incident.

Completed case files, with all original documentary evidence, will be maintained for up to 10 years after the student graduates.

Feedback

Each person who reports a concern should expect to receive feedback from the CPT that the concern has been dealt with, although specific details as to the outcome will not necessarily be shared. If there is no feedback, and there is on-going cause for concern, then the reporter should contact the Head of School to make sure that action is being taken.

Confidentiality

Confidentiality is an issue that needs to be discussed and fully understood by all those working with students, particularly in the context of child protection. The only purpose of confidentiality in this respect is to benefit the student. A member of staff must never guarantee confidentiality to a student nor should they agree with a student to keep a secret, as where there is a child protection concern this must be reported to a member of the CPT and may require further investigation in line with school procedure.

Other staff will be informed of relevant information in respect of individual cases regarding child protection on a “need to know” basis only. Any information shared with a member of staff in this way must be held confidentially to themselves.

In cases where a Report of Concern involves the disclosure of a Breach in the Code of Conduct observed by a colleague, reports must be made direct to the Head of School / Division Principal and confidentiality as to the source of the report will be preserved as far as practicable. The Report of Concern will be filed in a confidential file in the HR Department.

Use of BIS Facilities by External Activity Providers and Community Groups

BIS will endeavor to ensure that all External Activity Providers and Community Groups who use our facilities outside of normal school hours, understand BIS’s Child Protection Policies and Procedures and that BIS reserves the right to terminate any agreement with any provider that is deemed to not be following BIS’s Child Protection Policies.

Annex 1 – Forms of Abuse

Physical abuse

Physical abuse of a child is that which results in actual or potential physical harm from an interaction or lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents.

Emotional abuse

Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potentials and in the context of the society in which the child dwells.

There may also be acts towards the child that cause or have a high probability of causing harm to the child’s health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power.

Acts include restriction of movement, patterns of belittling, and denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment, including bullying.

Neglect and negligent treatment

Neglect is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the child’s health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.

Sexual Abuse

Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to:

- The inducement or coercion of a child to engage in any unlawful sexual activity.
- The exploitative use of child in prostitution or other unlawful sexual practices.
- The exploitative use of children in pornographic performances and materials.

Indicators that a child may be suffering Abuse

The following physical and emotional / behavioral indicators may suggest that a child is in need of support and potentially at risk of / suffering from some form of abuse. They may also be an indication of something else such as a bereavement or other temporary trauma. It is important to report anything seen or observed so that trained counselors can meet with the student to assess what support the student needs, whatever the reason.

Possible Physical indicators

- Injuries (bruises, welts, cuts, burns, bite marks, fractures, etc.) that are not consistent with the explanation offered (e.g. extensive bruising to one area).
- Presence of several injuries (3+) that are in various stages of healing.
- Repeated injuries over a period of time.
- Injuries that form a shape or pattern that may look like the object used to make the injury (e.g. buckle, hand, iron, teeth, cigarette burns).
- Facial injuries in infants and preschool children (e.g. cuts, bruises, sores, etc.).
- Injuries not consistent with the child's age and development.
- Bald patches on child's head where hair may have been torn out.
- Repeated poisonings and/or accidents.
- Frequent psychosomatic complaints, headaches, nausea, abdominal pains.
- Child is unwashed or hungry.
- Unattended medical and dental needs.
- Ingestion of cleaning fluids, medicines, etc.
- Consistent hunger.
- Nutritional deficiencies.
- Inappropriate dress for weather conditions.
- Poor hygiene persistent (untreated) conditions (e.g. Scabies, head lice, diaper rash, or other skin disorders).
- Sexual drawings or language.
- Bedwetting.
- Eating problems such as overeating or anorexia.
- Self harm or mutilation, sometimes leading to suicide attempts.
- Substance or drug abuse.
- Venereal disease in a child of any age.
- Frequent urinary tract infections for young children both male and female.
- Evidence of physical trauma or bleeding to the oral, genital, or anal areas.
- Difficulty in walking or sitting.

- Not wanting to be alone with an individual.
- Pregnancy, especially at a young age.

Possible Behavioral indicators

- Refusing to change into PE clothes, fear of bathrooms.
- Child running away from home and not giving any specific complaint.
- Saying they have secrets they cannot tell anyone about.
- Parents are uninterested in child's academic performance.
- Suddenly having unexplained sexual knowledge, behavior, or use of language not appropriate to age level.
- Unusual interpersonal relationship patterns.
- Depression.
- Poor impulse control.
- Demands constant attention and affection.
- Lack of parental participation and interest.
- Delinquency.
- Regularly displays fatigue or listlessness, falls asleep in class.
- Steals food, or begs for food from classmate(s).
- Reports that no caregiver is at home.
- Frequently absent or tardy.
- Self destructive.
- Drops out of school (adolescent).
- Takes over adult caring role (of parent).
- Lacks trust in others, unpredictable.
- Plans only for the moment.
- Runaway attempts and fear of going home.
- Stilted conversation, vacant stares or frozen watchfulness, no attempt to seek comfort when hurt.
- Describes self as bad and deserving to be punished.
- Cannot recall how injuries occurred, or offers an inconsistent explanation.
- Wary of adults or reluctant to go home.
- May flinch if touched unexpectedly.
- Extremely aggressive or withdrawn.
- Displays indiscriminate affection seeking behavior.
- Abusive behavior and language in play.
- Poor sleeping patterns, fear of the dark, frequent nightmares.
- Sad, cries frequently.
- Drug/alcohol misuse.
- Depression.
- Abandonment.
- Consistent lack of supervision.
- Poor memory and concentration.
- Mental or emotional development lags.
- Behaviors inappropriate for age.
- Fear of failure, overly high standards, reluctance to play.
- Fears consequences of actions, often leading to lying.
- Extreme withdrawal or aggressiveness, mood swings.
- Overly compliant, too well mannered.
- Excessive neatness and cleanliness.

- Extreme attention seeking behaviors.
- Poor peer relationships.
- Violence is a subject for art or writing.
- Complains of social isolation.
- Forbidden contact with other children.
- Repeated communications from the school unheeded.
- Both parents or legal guardian are absent from Jakarta for any period of 24 hours or greater.
- Parents cannot be reached in the case of emergency.
- Lack of appropriate supervision—this would include failure to provide proper adult guardianship* such as leaving children unsupervised at home for any extended period of time.