



## SAFEGUARDING POLICY

### A. PURPOSE

Mile Bilingual School expects all employees in our school, as well as parents, visitors, and providers, to recognize that when a student is at risk of being hurt or is in a dangerous situation, actions will be taken to reduce the risk of harm.

We recognize that the protection of our students is very important in our school. They could identify risky situations and ask for help for themselves or other students.

In this document, the following terms will be used:

**Student:** any student of Mile Bilingual School, regardless of age, as well as visitors who are minors, are considered as students.

**Collaborator:** Any member hired by Mile Bilingual School, regardless of position or job.

To prevent situations escalating and becoming a risk, Mile Bilingual School adheres to the following principles:

- The well-being of the student is our priority.
- Every student has the right to be protected from harm and exploitation. The welfare of a student is indiscriminate of race, religion, ability, disability, gender or culture.
- All students should be and feel safe in their school.
- Every student has the right to receive strategies and skills to help them keep themselves safe.
- All adults in the school must show a commitment to protecting the students with whom they work.
- At Mile Bilingual School we work closely with parents, guardians, and other professionals to ensure the protection of our students.
- All students have the same rights to protection, but we recognize that in some cases, more support will be needed. Some of these cases may fall under situations of special educational needs, disability, gender, religion and sexual orientation



## 1. Scopes and Objectives

Mile Bilingual School aims to:

- Provide a safe and happy environment that encourages growth and learning in our students.
- Outline the system and procedures that we have to make sure that students are safe within the school.
- Raise awareness in all employees about issues related to safeguarding / protecting the minor, as well as defining their roles and responsibilities when reporting possible cases of abuse and / or risk.
- Identify students who are suffering or may suffer some harm.
- Ensure effective communication between employees on issues related to the safeguarding / protection of the minor.
  
- Establish effective procedures for collaborators or external providers who encounter any situation related to the safeguarding / protection of minors in our students.
- Be clear with all those involved, including students, parents or guardians, about the safeguarding and protection policies of the minor.
- Be clear with everyone involved, including students and their parents or guardians, about our approach to Safeguarding and child protection through the review of clear policies.

## B. SCOPE

Safeguard policies will be endorsed by ISP, signed by General Management and will be adopted by all levels of the organization. This policy will apply to any outside agency or provider that has unsupervised access to students.

## C. DEFINITIONS

### 1. Safeguard

Safeguard and the well-being of the minor refers to the processes that are applied to protect a student from harm, preventing any damage to their health and development. We seek to improve the health and well-being of the students in our care to help them have optimal life opportunities that allow them to develop in a happy, safe and healthy way.

### 2. Protection of minors

The protection of minors is the central element of safeguard and is defined as the responsibility to protect children and adolescents who are suffering or may be at risk of suffering some harm as a result of some type of abuse or neglect.

Note:

If the preventive work around a Safeguard issue is not given to a sufficient extent, the students reported under a possible risk situation may change to a significant risk situation. Although there are factors that may be beyond the school's control, the purpose of this policy is to ensure that Mile Bilingual School takes every possible action to prevent a situation from escalating.



## **D. REGULATIONS**

This Policy describes the principles and expectations, as well as the procedures, that must be adopted by the school. This Policy also describes the steps that are taken to fulfill our commitment to safeguarding our students.

Due to the international context to which we belong as part of ISP, the school recognizes and accepts its responsibility towards the safeguarding of all students under the United Nations Convention on the Rights of the Child (1989). ISP and the school recognize the obligation to protect our students from harm. In particular, the following articles of the United Nations Convention are followed.

Article 3: establishes that the priority for making decisions related to a child must be his or her well-being.

Article 13: establishes that a child has the right to receive and share information as long as it does not cause harm or harm to other people.

Article 14: establishes that children have the right to think and believe what they want and / or practice their religion.

Article 19: establishes that children have the right to be protected from physical and / or emotional abuse and damage.

Article 34: establishes that governments must protect children from sexual abuse and exploitation.

Article 35: establishes that governments must take the necessary measures to ensure that children are not trafficked, sold or kidnapped.

Article 36: establishes that children must be protected from any activity where their well-being and development are damaged.

Article 37: establishes that no person has the right to punish children in a cruel or harmful way.

All members of the United Nations signed this agreement in 1989, with the exception of the United States of America.

All articles can be reviewed at the following link:

[http://www.unicef.org/crc/files/Rights\\_overview.pdf](http://www.unicef.org/crc/files/Rights_overview.pdf)

## **E. RESPONSIBILITIES**

### **General Director**

Head of School recognizes its responsibility to ensure that the organization understands and follows the guidance provided in this document, as well as in any other document related to safeguarding.



### 3. General Director and Section Director:

The Directors of the different grades of school and the Head of the School will seek to:

- Ensure that the policies are implemented at all levels of the school and are followed by all collaborators.
- Give enough time and resources to promote that the Designated Safeguard Leader and Safeguard Delegate (if appointed) can carry out their work effectively.
- Ensure that the culture of the school facilitates the presentation of the concern and this is handled in a timely and appropriate manner.
- Ensure that the school is a safe and secure place.
  
- Ensure that safeguarding topics are part of the school's curriculum.
- Ensure that local legislation and relevant support agencies are part of this policy.
- Only allow new collaborators who will have unsupervised contact with students once they have completed the safe recruitment procedure.
- Maintain a record of all the training that employees have had in relation to safeguarding and protecting the minor. This record should be available for inspection during an audit and should reflect the timing indicated for the renewal of training.

### 4. Designated Safeguarding Lead

The school has identified one person for each grade as the Designated Safeguarding Lead (DSL), who supports all the staff. These people will receive appropriate safeguarding training in order to carry out their duties, will be provided with sufficient time during the day to carry out their responsibilities, and will prioritize the duties in this case when necessary.

The role of the Designated Safeguarding Lead is guided by two principles:

- The well-being of a student is the highest priority.
- Confidentiality will be maintained to the extent possible.

Guided by these principles, the Designated Safeguarding Lead shall:

- Play an important role in ensuring that the school reacts and responds to a risk situation for a student.
- Together with the Directors of the different areas, ensure that all staff, teaching, administrative and operational, are aware of their responsibilities in relation to the protection and safeguarding of students.
- Have additional adequate training related to the subject and its functions.
- Keep and maintain an adequate and confidential record of students.
- Clearly understand the local institutions to contact if necessary to carry out a case related to safeguarding.
- Know the local regulations, procedures and legal agencies that can offer support in relation to the issue of safeguarding.

All members of the school, collaborators, parents and providers, have the responsibility



to report to the Designated Safeguarding Lead any suspicion they have in relation to the safety of the students in their charge. The responsibility of the Designated Safeguarding Lead and of the Dirigenza is to decide the action plan to follow and take the pertinent actions.

**5. School members (including external providers who have unsupervised contact with students).**

All members of the school must:

- Be familiar with and follow the documents and policies related to the treatment and care of the student in order to carry out safe practices.
- Be subject to a safe recruitment and review process prior to starting their work within the school (unless there is an action plan that allows them to supervise that member until the process is complete).
- Be alert to indicators or signs of possible abuse.
- Listen and take students' perspectives and concerns seriously.
- Record any suspicious situation and report in writing to the Designated Safeguarding Lead..
- At Mile Bilingual School, the Designated Safeguarding Lead are: for Mile kids Arianna Ducoli, for Primary School Manuela Dolci and for Middle School Susana Pezoa. They can be reached on their email.
- Follow the procedure stipulated in this document to raise a concern when there is a suspicion / concern about a situation involving a student.
- Support students, members or other adults who have suspicions of a situation to act appropriately and effectively in the investigation that may arise.
- Take any course that the school deems necessary in relation to safeguarding and safe recruitment, as well as its subsequent updates.
- All members must recognize that if their actions inside or outside the school violate the ISP-Mile Bilingual School code of conduct, the corresponding administrative or legal measures will be taken.

All those who have occasional or supervised contact with students (including external providers) should:

- Receive an induction regarding their role and understand what they should do if they have a suspicion and with whom to go to report it.
- Provide documents that demonstrate, when necessary, that external providers have adequate selection processes and that they have received a talk or induction about the safeguarding and protection of the minor before starting any type of service in an ISP school. When these providers are constantly being supervised, the selection process review will not be mandatory, but Mile Bilingual School will need to assess the risk that this entails.
- If third-party providers do not have their own safeguarding and child protection policy, they will be asked to read and follow this document. These requirements will be part of any contract.
- Follow the guidance provided in this document at all times.
- Have guidance and support regarding safe work practices.



## F. TRAINING AND SUPPORT

ISP-Mile Bilingual School will ensure that:

- Employees within the school have adequate general training upon joining the organization and are updated at least every three years. This training will be available through Learning Hub, as well as face-to-face trainings.
- Relevant documents are available in various languages.
- Employees have the support and skills to recognize and act in situations where students are at potential risk.
- Those who have the responsibility of being Designated Safeguarding Lead have appropriate and updated information, as well as specialized and additional training (approved by the Regional Human Resources Director). This will be updated every 2 years.
- All collaborators will be subject to a complete introduction, which includes the steps to follow when they have suspicions or concerns about the safety of a student.
- The team responsible for personnel selection is trained in safe recruitment processes. This training must be updated every five years.
- Newly recruited members must complete the training in its entirety before they can have unsupervised contact with students.
- Any student who is or is experiencing abuse will receive support. Once it has been agreed to conduct an investigation with a legal agency (if needed), students will be offered direct support through Personalized Education or an outside agency.
- All schools belonging to ISP will have information regarding local, regional or national bodies that can provide support in these circumstances.

ISP recognizes the importance of taking care of its collaborators. ISP will be in a position to offer or refer appropriate external support to anyone who has been affected by dealing with a safeguard issue. ISP will maintain a directory of organizations (such as law firms, hospitals, psychologists, psychiatrists) that can be contacted by employees if they need it.

***Please remember that, unless specifically asked, you should never conduct an investigation of any suspected abuse. This may require highly specialized work and may interfere with a legal investigation.***

## G. FORMS OF ABUSE

There are a number of ways in which a student can be exposed to danger and / or risks. All require a response. According to the World Health Organization, abuse is any intentional action or negligence in minors under the age of 18 that causes or may cause harm to the health, development and dignity of the minor.

The types of abuse generally referred to are:

- **Physical Abuse:** act of intentional aggression in which some part of the body or some object, weapon or substance is used to hold, immobilize or cause damage to the physical integrity of the other, directed towards their submission and control.





- *Emotional abuse*: pattern of behavior consisting of acts or omissions whose forms of expression can be prohibitions, coercion, conditioning, intimidation, threats and devaluation or abandonment behaviors that cause the recipient to deteriorate, diminish or affect their personality structure: any act that is proven to have been carried out with the intention of causing moral or psychological damage.
- *Sexual Abuse*: pattern of conduct consisting of act or omission and whose forms of expression may be to induce unwanted or consensual sexual practices, or that generate control, manipulation or dominance of the partner and cause harm.
- *Negligence*: those behaviors of omission in the physical care of the child or adolescent by the persons in charge of their care, custody or education, which may cause physical, cognitive or emotional damage to him or her property, as a result of the absence of interest for the good emotional and educational development of the child.

While the above mentioned are the main categories under which abuse occurs, this can take various forms in one of several ways.

The school and its members will be aware of what to look for and what actions to take when abusive situations arise.

### 1. Autolesion

Selfinjury can manifest itself in various ways, either physical and / or emotional. There are many reasons why a student wants to hurt himself. Once started, this can turn into a compulsion. Because of this, it is important to catch it as early as possible and do everything to help. Self-harm is not always a suicide attempt or a means of obtaining care. Usually, it is a way for students to release emotional pressure and it can be a way to deal with their reality. Regardless of the reason, it must be taken seriously.

The exact reason why students choose to hurt themselves is not always easy to understand. In fact, even they may not know why they do it, even though there is a relationship between depression and self-harm. It is common for a student who self-harm is being bullied at school, feels under a lot of pressure, is being emotionally abused, going through a bereavement or having difficulties with his family and / or friends. The feelings that these issues can cause are: low self-esteem, low self-confidence, isolation, sadness, anger, little emotional response or little control. Students can take very serious actions to cover up their self-harm and generally justify it as accidents.

Here are some indicators that can help employees identify possible self-harm:

- Physical indicators such as cuts, bruises, burns, trichotillomania (hair pulling).
- Emotional indicators such as depression, sudden weight loss, drinking alcohol or using drugs, unusual changes in eating, and isolation.

If a collaborator suspects that a student is self-harming, the situation should be referred to the Designated Safeguard Leader, who will decide the steps to follow. This is likely to include a discussion with the student in question and their parents or caregivers to refer the minor to relevant outside organizations or personnel.



## **2. Sexual**

Sexual exploitation of children under 18 years of age may involve relationships where the student receives something in exchange for performing sexual acts. The sexual exploitation of any student can be in person or through the use of technology, such as cell phones or computers. In the latter, a student may be encouraged to send indecent images of himself.

In all cases, the abuser does so by using his power over the student. This power can be based on being older, having greater physical strength and / or financial resources that exceed those of the student. The use of violence, intimidation and / or coercion are common in these types of situations.

## **3. Female Genital Mutilation (FGM)**

FGM is a form of child abuse and violence against women, therefore, should any situation arise, it will be addressed as far as possible and following the procedures in this document.

FGM is potentially harmful to a child, both emotionally and physically. In addition, it violates several articles that are under the United Nations Convention. This is illegal in 26 countries in Africa and the Middle East, as well as 33 other countries including the United States and Great Britain.

We recognize that this is a cultural practice in some countries and is not always perceived as an abusive practice. This practice is not condoned, but one must be alert about what this act implies; as well as ensuring the interests of the students.

## **4. Forced marriages (MF)**

Forced marriage (MF) is one that takes place without the consent of one or both partners and where coercion is a factor. In this, someone faces physical pressure to get married (threats, physical violence and / or sexual violence) and / or emotional or psychological pressure (manipulating or making them feel that they are an embarrassment to the family). This is very different from an arranged marriage, where both partners have consented.

In 2013, the first United Nations Human Rights Congress adopted a resolution against forced marriages. This resolution recognizes that forced marriage is a violation of human rights, which "prevents individuals from living free of violence."

We recognize that this is a cultural practice in some countries and is not always perceived as an abusive practice. This practice is not condoned, but one must be alert about what this act implies; as well as ensuring the interests of the students.





## 5. Sexting

Sexting is when a person shares images, videos or content of himself that implies a sexual context, nudity or semi-nudity, as well as sexually explicit messages. There are several reasons why a student may want to send their nude or semi-nude photograph, video, or message to someone else:

- Access it because they think "everyone is doing it."
- Raise your self esteem.
- Flirting with others and proving your sexual identity.
- Explore your sexuality.
- Have attention and connect with new people on social networks.
- It can be difficult for them to say no if a person asks for a sexually explicit image, especially if the person asking is persistent.

Students are not always aware that by creating and sending these images they may be committing an illegal act. Ideally, we do not seek to deal with these acts from a criminal perspective. Support and learning can be a more beneficial way to attack sexting.

## H. SPECIFIC SAFEGUARDING ISSUES

### 1. Electronic Security

The increasingly common use of electronic devices in our daily lives has created additional risks for students. Some risks and dangers of using electronic devices are:

- Inappropriate content.
- Ignoring age restrictions and communicating with unfamiliar adults and / or other minors (making minors vulnerable to being harassed at school or sexually).
- Harassment and sexual abuse.
- Give personal information.
- Gambling or accumulating debt.
- Cyberbullying

Cyberbullying is an increasingly common form of bullying and is more related to the use of social media and cell phones.

ISP believes that the best way to protect our students is by teaching them to understand and be aware of the risks through programs that promote personal and social growth in this area. The school has adequate and frequent opportunities in its curriculum to teach children how to recognize when they and others are at risk. It seeks to equip them with the skills, language and strategies they need to take appropriate actions.



## **2. Use of cell phones and taking pictures**

The school is committed to the care of our students, so it hopes that all employees, students, parents and visitors share this commitment. Mile Bilingual School recognizes the need to ensure, as far as possible, the safety of our students, so it implements a procedure use of mobile devices, cameras and safe video-photography for all members of the educational community. This procedure is intended to ensure the responsible use of such devices within the school and during school events.

The school has a Policy for the use of cell phones and taking pictures. (see Cell Phone Use Policy).

## **3. Whistleblowing**

ISP recognizes that students cannot be expected to report unsafe situations if the adults around them do not. All collaborators and suppliers must be aware of their responsibility to report actions or attitudes of colleagues that go against the well-being of a student.

A complaint can be filed against a colleague or supplier at any time. It is important that any complaint is treated seriously and following the appropriate procedures.

The school has a Policy for reporting Irregularities. (see Policy for Reporting Irregularities).

## **4. Anti-Bullying / Harassment**

Collaborators and suppliers must take seriously any complaint related to bullying of any student. The necessary actions will be taken to investigate and prevent the repetition of these incidents or behaviors. Bullying can be in person or through the use of technology. The school has a policy against School Harassment that contains the way to approach this situation (see Antibullying Policy).

## **5. Children with Special Educational Needs or with Disabilities**

All collaborators must recognize that students with Special Educational Needs and / or with Disabilities may imply additional challenges in terms of Safeguarding. Depending on the nature of the educational need or disability, there may be additional barriers that make it more difficult to identify and recognize signs of abuse. For example, it may be easy to assume that a student's humor, behavior, or injury is due to his disability and not to an abusive situation. It should also be recognized that students with disabilities may not show outward signs of distress when they are being bullied or abused. A difficulty in communication can make the task of identifying signs of abuse in a timely manner especially difficult, for which the collaborators must pay special attention and report indications, avoiding assuming, about the causes of a behavior or injury.

## **6. Complaints made by a student against another student (Peer Abuse)**

ISP and Mile Bilingual School recognize that students are capable of abusing their peers. When a complaint of this nature is raised, it will be taken seriously and as a matter of safeguarding. Peer abuse can take various forms and gender issues can be observed. An example of this may be students who are being touched or approached in an inappropriate way by others or who are being attacked. Peer abuse will not be tolerated.



## **7. Safe recruitment and selection of personnel**

ISP and Mile Bilingual School will do everything in their power to ensure that those people who work with our students in our school and organization are the right people for it. To achieve this, all members who must work in an unsupervised manner with minors will be recruited through a secure recruitment procedure (see Safe Recruitment Policy).

## **8. Physical intervention**

There may be times when adults within the school, as part of their responsibilities, must physically intervene to prevent students from hurting themselves or others. This intervention must be reasonable and proportional to the circumstances under which it applies, seeking to make it the last possible option. The school has a Physical Intervention Policy (see Physical Intervention Policy)

## **9. Intimate care**

There may be times when students need to wash or change clothes for reasons such as incontinence, vomiting, food accident, or pain in an intimate area. All employees must be aware of how to support a minor in a situation of this nature to ensure that all minors who need intimate care are treated with respect and sensitivity, in such a way that the care offered promotes their well-being.

The school has an Intimate Care Policy (see Intimate Care Policy.)

## **I. PROCEDURES**

### **1. Adults concerned about a Student**

If a collaborator and / or provider suspects that a student under their care may be the victim of some type of abuse or is at risk experiencing abuse, they should not try to investigate the situation. They should go to the Designated Safeguarding Lead as soon as possible to inform him of the situation.

In the event of any suspicion of possible abuse or that a student is putting himself at risk, collaborators should notify the Designated Safeguarding Lead. It is better to have these suspicions and to be able to verify that they have no basis, than not to allow a student to be protected in an abusive situation. In many cases, students will not talk about these situations directly, but the adults around them will be able to observe signs in their behavior, physical or emotionality that indicate a possible risk situation. In these circumstances, collaborators must use the Concern Form format that is available to report to the Designated Safeguarding Lead.

This record must be filled out by hand, being as specific as possible (including date and time) with the observations that raise your suspicion.

This record must be delivered in person to the Designated Safeguarding Lead. It cannot be delivered by third parties or by email.

No complaint will be taken if you do not meet the above requirements.

When a student discloses information directly, the steps mentioned in the next part of the



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document must be followed.



## **2. Disclosure, reporting and consequential actions General**

### **Principle:**

If a student asks to speak to a person about a problem, they cannot be promised to protect the confidentiality of the information, especially if the problem the student describes refers to some type of abuse that they are suffering themselves or other students. Collaborators should mention this before having a discussion with a student.

**The main elements of the following guide are the following steps:**

### **Receive**

Whenever possible, a student who wishes to speak confidentially should be heard. We know that many times students find inopportune moments to do this, but it is important to give them a space even if this implies saying "at this moment I can not attend you, but find me (give time and date to talk)" When possible during a moment of confidentiality, try to listen, allow silences and try not to be shocked or incredulous at the information they give you.

### **Reassure**

Try to stay calm, not judgmental, and empathize with the student. Never make a promise that you can't keep. Reassure the student as much as possible by informing about what you are going to do. Reassure the student that they did the right thing by telling you.

### **React**

React to what the student tells you by saying only what is necessary to learn more about the situation. Don't ask questions that can guide him. Keep questions open like "Is there anything else you want to tell me?" Try not to criticize because the perpetrator of the abuse may be a person from the direct family or a close member of the student, who may have feelings of attachment to said person.

### **Record**

Make notes of what the student tells you while talking about it. If this is not possible, do so as soon as possible and definitely within the first 24 hours after the disclosure made by the student. Make sure to write their exact words and not an interpretation of yours. Write the day, date, time and place. (See Concern Form).

### **Report**

When a student shares a situation or you have suspicions about something that may be happening, it is important that you follow the procedures and recommendations generated

in this document. A handwritten Concern Form must be submitted to the Designated Safeguard Leader and where relevant, include a body map.

When a student has shared information that indicates that they are being abused, the Designated Safeguarding Lead should be informed as soon as possible, or in his absence, the Safeguarding Delegate (if appointed). In case you cannot find any of these people, go to Section Management. The Designated Safeguard Leader will collect the available evidence by taking notes from any available source of information.

The Designated Safeguarding Lead will decide what actions and decisions to take in this



regard, always outside the local legal framework. It is important that there are complete

records of these actions and decisions, as well as keeping these records locked up in a safe place.

ISP recognizes the diversity and contextual complexity that each school has. Therefore, the following principles must be taken into account when there is a situation of disclosure, reporting and action regarding a safeguard situation.

As an international school we:

- We recognize the limitations regarding the protection of minors.
- We need to ensure the quality and skills of professionals who work with students who have suffered abuse or self-harm in order to determine the limits of their work.
- We need to act in accordance with local legislation, as well as the principles and practices stipulated in this document.

### **1. Local Agencies and Consultants**

The school has a directory of local agencies and consultants on safeguarding issues in a separate document.

### **2. Records and Confidentiality Records**

All records of concerns, statements or allegations should be treated as sensitive information and should be kept securely together and separate from general student records. This information should be shared with those who need it, in order to take appropriate steps to maintain the safety of the student. No more information will be shared than what the Designated Safeguard Leader deems pertinent.

- When a collaborator has a concern regarding a student, they should go to their closest copy center and request a Concern Form format. In this, the member must fill in the corresponding information and send the document in their own hands to the Designated Safeguard Leader. Although the reason may seem trivial or unimportant, it may be something more serious or serious. A raised concern may not require more than a discussion with the Designated Safeguard Leader, but it may be a situation that can reach a legal scope. If there hasn't been a specific incident that you can point out, try to be as specific as to why you are concerned.

In the case of a statement, the report must include:

- What the student has said (in his own words).
- The questions that the student was asked.
- Place and time of the declaration.
- Who was present at the time of the statement.
- The behavior of the student, from where the student was taken to talk with him and where he was delivered at the end of the statement.



### 3. Confidentiality

The school will keep all information related to safeguarding / protection of the minor under confidentiality protection and will be treated in this way. Relevant information should only be given to the appropriate persons and with the approval of the Director of each area or grade and / or Designated Safeguard Leader.

All records related to the protection of the minor must be properly guarded. The information can be in a digital database along with printed records, as long as it is secured on the school's server.

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