

## Child Safety and Protection Policy and Procedures

LDi includes iSC schools in China and MENA (including CDES, CDIS, iSQ, TWS, TIS, WYIS, iSW, THIS, YIA) and any other LDi entities.

### Introduction:

The LDi Child Safety Policy and Child Safety and Protection Code of Conduct are based on the belief that:

- Every child has an equal right to be protected from harm and maltreatment & everyone has a responsibility to support the protection of children. These are internationally recognized rights and responsibilities
- Schools and educational organizations have a duty of care to children enrolled in the school and those who are affected by the operations of the school. Likewise we have a duty of care to protect children and act with a sense of urgency if a child is at risk of harm.
- In any action relating to child safety and protection the best interests of the child are paramount
- the safety and protection of children is a mandate of faith
- Our iSC 9 qualities (of purpose, persistence, discernment, connection, curiosity, compassion, courage, humility and service) move us to protect children and respond with courage and wisdom if a child is experiencing harm or maltreatment.

LDi seeks to ensure that its values, policy and actions align with the responsibilities set out in applicable local, national and international law including applicable provisions of:

- UAE Federal Law No. 3 of 2016 - On Childs Rights (Wadeema's Law)
- Minors Protection Law of the People's Republic of China, 2012, Article 5
- Anti-Domestic Violence Law of the People's Republic of China, 2015, Articles 14 and 35
- Georgia Code Section 19-7-5
- China and the UAE have both ratified the UN Convention on the Rights of the Child

Therefore LDi believes it has an ethical and legal obligation to ensure the protection of its students and other children in instances of suspected child maltreatment. LDi seeks to;

- educate its staff, volunteers and students about child safety,
- establish safe environments for students and other children,
- enact policies and practices that protect against any form of maltreatment,
- respond compassionately, professionally and urgently to any form of suspected maltreatment,
- report to relevant authorities as appropriate and always seek to prioritise the best interests of the child.

Note:

- The term "**Child**" or "**Children**" under this policy shall refer to any individual under 18. In addition, the term "child" shall also include any individual who is a student or otherwise placed under the care of an LDi organization, even if that individual is over the age of 18.
- LDi includes iSC schools in China and MENA and any other LDi entities.
- Where the policy refers to Head of School, this also includes the Director if you are from a non-school entity.
- Summaries and translations of the laws listed above can be found in on Sharepoint in Corporate/Child Safety.

## Child Maltreatment Defined

Child maltreatment is a violation of a child's human rights and is an obstacle to every aspect of a child's development. As defined by the World Health Organization, child maltreatment is the abuse and neglect that occurs to a child under 18 years of age. It includes all types of physical and/or emotional maltreatment, sexual maltreatment, neglect, exposure to intimate partner violence (also known as domestic violence) and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Maltreatment usually occurs where there is a basis of trust and a difference of power based on age, physical, intellectual or emotional capacity.

Should both parties in a concern be under the age of 18, factors considered in evaluating whether maltreatment occurred includes; (1) any differences in age, responsibility, trust, power, development, awareness and understanding between the children, (2) whether coercion or threats of any kind were used (3) any other factors relevant to the context.

### Further definitions under this policy:

**Physical Maltreatment** of a child is any act that causes or threatens to cause a non-accidental physical injury to a child, or placing a child in a situation where the child experiences or faces the threat of a non-accidental physical injury.

This can include but is not limited to: hitting, beating or slapping a child with hands or objects, shaking a child, pulling a child by the hair, kicking a child, throwing a child, biting or scratching, burning/scalding or making a child unwell by making up symptoms or misusing medications. (This definition does not include Munchausen Syndrome By Proxy)

Some signs of physical maltreatment could include unexplained physical injuries such as bruises or burns or injuries in places not normally impacted by general injury, fear of returning home, distrust of adults, physical aggression to other children, unusual covered limbs in hot weather, high passivity and compliance.

As well as causing physical harm, physical maltreatment can cause short- and long-term psychological distress. Some long-term impacts of repeated physical maltreatment include: physical harm, permanent disabilities, anxiety, depression, withdrawal, behavioral issues, eating disorders, self-harm and drug and alcohol use.

**Emotional Maltreatment** includes statements made, threatened to be made, or allowed to be made by the person responsible for the child's care that have a material, damaging effect on the child's emotional development. The persistence, intensity and severity of these acts or omissions and the level of impact of these acts on the child are important in assessing maltreatment.

This can include but is not limited to: exposure to family violence, a pattern of threatening, manipulating, humiliating or overly controlling a child, a pattern of demanding behavior or setting expectations that are not age appropriate, social isolation, persistently ignoring or isolating a child, repeated exposure to violent graphic material (including non verbal acts) that is age inappropriate; or a pattern of similar, comparable conduct. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of a child. Some level of emotional abuse is involved in all types of maltreatment of a child, though it can occur alone.

Some signs of emotional abuse could include the child becoming withdrawn, depressed, having difficulty forming relationships, struggling to control emotions, high anxiety or obsessive behavior, low self-esteem or attention seeking behaviour.

**“Sexual Maltreatment”** is any incident of sexual conduct involving a child, it includes committing, allowing to be committed, or threatening a sexual act upon a child whether or not the child is aware of what is happening. These can be contact acts (penetrative and non penetrative) or non contact acts. Aiding, encouraging, or grooming a child to engage in sexual behaviour also constitutes sexual maltreatment. Sexual Maltreatment can occur in person or online.

This includes but is not limited to: inappropriate discussions about sexual matters. showing children or young people pornographic material, using technology to facilitate offline abuse, indecent exposure in the presence of a child; making, viewing or distributing child abuse images or sharing such images with children, making a child undress or touch someone else, kissing, rubbing and touching inside or outside of clothing, oral sex, intercourse, any action (including verbal acts) undertaken with the intent to arouse or satisfy the sexual desire of any individual.

Some signs of sexual abuse could include: self-harm, social withdrawal, regressive behaviour in sleep/bed wetting/anxiety around adults, urinary tract infections, genital pain/discomfort, being unusually withdrawn or aggressive, displaying knowledge/interest/language about sexual acts inappropriate to their age, a ‘special/secret’ relationship with an adult or young person.

**Neglect** includes the failure, whether intentional or not, of the person responsible for the child's care to provide and maintain adequate food, hygiene, clothing, medical care, emotional support, or education. Neglect also includes the failure to provide adequate supervision in relation to the child’s age or developmental level.

Some signs of neglect can include poor hygiene, missing school, depression, heightened need for affection, obsessive behavior and untreated medical concerns.

## Background Screening to Assure Child Safety

An individual shall not be allowed to serve in any capacity (staff or volunteer) with a LDI organization where the background screening or any other information that reveals the individual engaged in any prior behaviour constituting or posing a risk of Sexual Maltreatment of a child , or as an adult engaged in any crime of a sexual nature. An individual shall not be allowed to serve in any capacity with LDi where that individual has engaged in any behavior that reasonably indicates that this individual would pose a risk of Physically Maltreating, Emotionally Maltreating, or Neglecting a child.

**Prospective staff** will go through the following background screening process:

- Written and complete application forms which include specific history of employment and volunteer work with children and questions related to child safety and protection. Veracity checking will include direct verbal follow up with respect to all written references.
- Checking of gaps in employment.
- Submission and checking of at least two (2) references which include specific inquiries regarding misconduct and/or child maltreatment history or concerns that the person could pose a risk of engaging in any form of child maltreatment.

- Personal interviews that include specific questions about prior work with children and history of any form of child maltreatment and/or misconduct, or any accusations or findings of child maltreatment.
- Questions regarding the applicant's personal history related to maltreatment.
- Criminal records background check where available.
- Preliminary psychological evaluations by an independent screening consultant hired by LDi for all professional staff hires.

All Staff must report to their Head of School any criminal conviction, arrest, or investigation for child maltreatment of any kind that has occurred since they began service with a LDi organization.

### **Volunteers**

- Shall not be allowed to work with students until they have completed the schools volunteer approval process which includes:
  - o completion of LDi Child Safety and Protection Training
  - o both reference checks and personal interview questions will include specific inquiries regarding misconduct and/or child maltreatment history and for the referee inquiries regarding if they have concerns that the person could pose a risk of engaging in any form of child maltreatment.
- Shall never supervise any child alone: they will always be accompanied by a staff member who has received child safety and protection training.

### **Child Safety & Protection Training**

- All staff and volunteers will participate in annual child safety and protection training expected to be completed before starting any work with or supervision of children under the care of a LDi organization.
- Child safety and protection training will be provided annually either face to face and/or via electronic means annually. It has 2 parts – Sexual Abuse Awareness and LDi Child Safety Policy Training
- Each person receiving training will be required to complete a follow-up quiz or questions within the text to assure clear understanding of the material. a score of 70% or higher is needed to pass.

Each Head of School and the Director of Child Safety work together to assign the responsibility of Child Safety Specialist to two (2) staff at each school. Where enrollments are below 100 students, they will assign one (1) Child Safety Specialist (CSS) who will work with a CSS from another school when a concern arises. Those serving in the role of Child Safety Specialist will receive professional, comprehensive training (at the expense of the organization) to fulfill the role. All staff/volunteers are expected to cooperate with a Child Safety Specialist acting within this role.

Students attending a LDi school will receive curricular instruction including but not limited to: Body Safety; Bullying Prevention and Response and Sexual Development Education (from 5<sup>th</sup> grade)

Parents desiring assistance in training their child on child safety related topics may request materials for use from their child's teacher and/or the Child Safety Specialist.

### **Child Safety and Protection Code of Conduct**

The Child Safety and Protection Code of Conduct sets forth specific behavioral standards for all adults in their interaction with students or any child under the care of a LDi organization and in any location while employed by or volunteering for

a LDi school or entity. Each employee and volunteer of LDi organisation is required to receive, read, and sign the Code of Conduct annually as part of the Child Safety training and **prior to** working with or supervising children under the care of a LDi organization

## Commitment to Respond

- 1) LDi will respond to every report of suspicion of possible child maltreatment. LDi's first priority in any instance of suspected child maltreatment is to ensure the safety of any affected children and to ensure that any potential victims have access to compassionate and professional resources to provide them care. Enacting a professional duty of care means to respond appropriately and in a timely manner to emergency and other situations whenever and wherever an enrolled student (or associated person/s) is at risk of maltreatment and immediate harm – or might potentially be at risk of maltreatment and harm.
- 2) In any case where there is a reasonable suspicion of child maltreatment, LDi is committed to reporting any alleged perpetrator to applicable government authorities and cooperating with any government investigation.
- 3) In any investigation of alleged child maltreatment, the role of the fact-finder is to determine if there is sufficient evidence that conduct meeting the definition of child maltreatment occurred applying the more likely than not standard. (More likely than not means there is at least a 50.1% likelihood that an event occurred; it is not the more onerous beyond a reasonable doubt standard that applies in criminal proceedings).
- 4) The Child Safety Specialist response process will take into account cultural mores relevant to the process; in cases where language is deemed a barrier, an interpreter will be called in to assist. In light of the sensitive, personal health matters that are involved in such inquiries, an interpreter will sign a confidentiality agreement if not a LDi staff member.
- 5) Staff and volunteers are expected to fully cooperate in any response process. Should a concern involve any staff family members the Team Director will be informed and the Team Director may be involved in the response process. Anyone who knowingly provides false or misleading information will be subject to appropriate disciplinary action up to and including termination of employment.
- 6) The process may necessitate that Staff or volunteers (e.g., those who have been accused of wrongdoing) be re-located, put on administrative leave, a leave of absence, or other appropriate action that LDi, in its sole discretion, believes is necessary in order to ensure the safety of children pending the outcome of the response process. Similarly where a student is accused of wrongdoing they may be suspended or other appropriate action that LDi, in its sole discretion, believes is necessary in order to ensure the safety of children pending the outcome of the response process
- 7) Child maltreatment in any form—sexual, physical, emotional, or neglect—by Staff, Volunteers, Students, Children of Staff or Volunteers, or anyone else serving in any capacity with a LDi organization will not be tolerated. A single act of sexual maltreatment by a Staff member or volunteer will result in permanent termination of employment or volunteer service with any LDi organization. A single act of physical maltreatment, emotional maltreatment, or neglect by a Staff member or volunteer will result in appropriate administrative action, up to and including termination of employment. In the case of sexual maltreatment by a student or a child of a Staff member or volunteer, a single act of sexual maltreatment will result in appropriate administrative action at LDi's discretion. Such actions may include suspension or expulsion of a student,

required counseling or other professional care for the student or child and his or her family, or a required leave of absence or cessation of employment for the parent of a child who has engaged in sexual maltreatment.

- 8) In cases where LDi has determined or learned that a Staff member or Volunteer has engaged in child maltreatment, or where a concern is outstanding, LDi will share this information as part of its response to a reference request submitted to LDi under its reference process procedures. In the case of a Staff member or Volunteer who holds a teaching or any other professional license or who is sent by, supported by or works /volunteers with another organization, LDi will notify any licensing authority, sending organization, and/or supporting organization in instances where LDi has determined or learned that a Staff member or Volunteer has engaged in child maltreatment or has left without completion of an assessment of a concern.

## Employee / Volunteer Response to Reasonable Suspicions of Child Maltreatment

Any LDi organization staff member or volunteer who has received a report or has reasonable suspicion to believe a child has suffered, or is at significant risk of suffering, child maltreatment in any form is **required to report**.

This includes:

- Physical, Emotional, and/or Sexual maltreatment
- Neglect, Sexual exploitation or exposure to intimate partner violence
- Inappropriate behavior between an adult and student/s
- Inappropriate emotional or physical relationship between an adult and student/s
- Maltreatment / Harassment of a student/s by staff or volunteer
- Threatening or bullying a younger/weaker student/s
- Sexual harassment between peers
  
- Any behavior that breaches the Child Safety and Protection Code of Conduct
- Indicators, Suspicion of, or Disclosure of the above behaviors will warrant a response
  
- Self harm, Suicidal ideation or suicidal behaviors – also follow the Suicide Intervention Protocol

*If a staff member, student, community member or volunteer has an anxiety or concern about a child or situation but are unsure if it needs reporting they are advised to talk the concern through with the school's Child Safety Specialist as soon as practical.*

### Other Behaviours:

The following behaviours are covered under other LDi/iSC behavioural policies - please speak to the designated teacher, Head of Department or School Principal concerning:

- lying, disrespect, cheating, gossip / slander, misuse of technology, malicious mocking /teasing, inappropriate language, disobedience, discrimination, gang activity, bullying / fighting between peers, non-sexual harassment.

Behaviors such as these may be indicators or symptoms of child maltreatment and as such should always be proactively assessed as to whether they constitute child protection concerns which must be referred onwards as

per the Reporting Procedure detailed below. It is critical that counselling and pastoral care efforts are closely integrated at all times with Child Safety and Protection.

Other more serious behaviors should be reported to the Head of School who will determine the best staff member to lead the response, they include:

- possession of weapons, self-harm, depression, threatening or violent behavior, age-appropriate sexual activity not acceptable in the place or context, possession or use of tobacco, alcohol, drugs or pornographic materials, non-abusive, but inappropriate, behavior by staff towards a student/s

The designated lead will; consider the signs of maltreatment as detailed earlier in this policy and always proactively consider the possibility that these behaviors can strongly indicate or be symptoms of Child Safety concerns for the child & where necessary they will be referred onwards as per the Reporting Procedure detailed below

The Lead will refer to the Suicide Intervention Protocol where relevant. As appropriate they will liaise with or involve the relevant Child Safety Specialist, School counsellor or other staff. The Head of School will follow-up with the designated lead within 2 weeks regarding intervention steps and/or resolution of a concern. Director of Child Safety will also follow up with Child Safety Specialist's when they are involved. Failure of an administrator/director to follow through and document action taken can be considered neglect and disciplinary action pursued by a LDi Executive Leader.

## Reporting a Concern

*Any staff member or volunteer who has received a report or has reasonable cause to believe a child has suffered, or is at risk of suffering, maltreatment is **required to report** according to the procedures below. Any member of the school community is encouraged to report to the school Child Safety Specialist if they identify a concern. Staff must report and leadership will respond appropriately to all allegations and reports, even if the victim or others involved do not want the response process to move forward.*

- WHO TO:** Your school Child Safety Specialist **and** Head of School as soon as possible and at the latest within 24 hours.  
In the unlikely event no Child Safety Specialist can be available within the first 24 hours, OR if the case is related to the Head of School, Child Safety Specialist, or close relative of either, report to the Director of Child Safety.  
A list of current Child Safety Specialist's is located on Sharepoint under LDi Corporate/Child Safety and on the Canvas Child Safety Training page
- WHEN:** As soon as possible and at the latest within 24 hours after receiving a report or having cause for reasonable suspicion  
If concerns exist about a student's **immediate safety FIRST** ensure their safety in conjunction with the Child Safety Specialist and/or your Head of School/Director ASAP.
- HOW:** You may initially report verbally or by submitting the Child Safety & Protection Report form. If you give a verbal report first, you must follow up with the written record as soon as possible. The Child Safety Specialist at your school can complete the written report with you.

**WHERE:** The Child Safety & Protection Report form can be found on Sharepoint in the folder 'LDi Corporate', 'Child Safety'. Volunteers should speak to their applicable team leader or Child Safety Specialist to obtain a copy of this form

After reporting and ensuring the child's immediate safety, it is the responsibility of the reporting staff member or volunteer to:

1. Maintain strict confidentiality according to the Code of Conduct.
2. Under no circumstances should staff members or volunteers undertake their own investigation to determine if child maltreatment has occurred before making a report of suspected child maltreatment to the Child Safety Specialist and Head of School. Doing so can put the child's safety and health at risk and compromise the integrity of an investigation process by authorities or LDi.
3. The reporter may at any time ask the Child Safety Specialist if the matter is being followed up. If concerns arise that this is not happening, then the reporting staff member or volunteer should notify the Director of Child Safety
4. Expect limited additional information due to confidentiality.

The response to a report of suspicion of child maltreatment will be directed by the Child Safety Specialist/s who have been designated and trained to respond, the Child Safety Specialist/s will liaise with the Head of School and keep them informed of their progress. The Child Safety Specialist's will notify relevant individuals (e.g. Divisional Principal, School Counsellor, Nurse, Team Director) if they need to be informed and involved in the response process to ensure the care and safety of the child. The Child Safety Specialist/s will ensure that the concerns are appropriately investigated and that reports are made to appropriate authorities/organizations.

The Child Safety Specialist/s will inform the Director of Child Safety (DCS) when there is an allegation of child maltreatment of any form. The DCS will support and follow up the Child Safety Specialist regarding intervention steps and/or resolution of a concern. Failure of an administrator/director to follow through and document action taken can be considered neglect and disciplinary action pursued by a LDi Executive Leader.

## Communication Process

- Parents/Guardians will be notified as soon as possible if their child is an alleged victim or offender of maltreatment.
- There may be instances in which informing parents of a report could be detrimental to the child or make matters worse. If such concerns exist, notification of parents will be delayed accordingly.
- Where at all possible, and commensurate with the age and capacity of a victim/s, significant efforts will be made to collaborate with her/him to ensure their involvement wherever possible in all decisions made and the actions taken that will directly impact upon them.
- If the victim is part of a supporting organization, the appropriate individual in senior leadership of that organization will be informed by the Director of Child Safety or other LDi Executive Leader.
- The Child Safety Specialists or designated lead will determine what information and/or feedback is given to the various parties involved in the process and will be responsible for this follow-up unless otherwise outlined in an Action Plan.