

# Country Day School

*A Nord Anglia Education School*

San Rafael de Alajuela,  
Costa Rica

## Child Safeguarding Policy

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## Introduction

In congruence with our [Mission Statement](#), CDS ensures a safe and nurturing environment for all children that fosters the learning and development of the whole-child. This includes practices and policies which protect the individual rights of each student.

Schools fill a special institutional role in society as protectors of children. As such, all children in their care are afforded a safe and secure environment in which to grow and develop, both at school and away. Educators, having the opportunity to observe and interact with children over time, are in a unique position to identify children who may be in need of help and protection. For this reason, educators have a professional and ethical commitment to identify children who may be in need of assistance and safeguarding, and obligated to take the necessary steps to ensure that the child and family avail themselves of the services needed to remedy any situation that constitutes child abuse or neglect.

Child abuse and neglect are violations of the laws of the Republic of Costa Rica as well as the [UN Convention on the Rights of the Child](#), of which Costa Rica is a signatory as well as applicable Costa Rican legislation such as, but not limited to, “Código de la Niñez y Adolescencia”.

***Article 19 of the UN Convention on the Rights of the Child:*** Protection from abuse and neglect:

The State shall protect the child from all forms of maltreatment by parents or others responsible for the care of the child and establish appropriate social programs for the preventions of abuse and the treatment of victims.

Violations of a child’s human rights may be obstacles to the child’s education as well as to their physical, social and emotional development. In congruence with these laws and aligned with standards and practices derived by similar schools, The Country Day School has developed and adopted a policy to serve as guidance to protect our children from possible violations and provide them with a safe environment for learning and growing. This policy addresses all types of human interactions; child to child, adult to child, child to adult, and adult to adult.

In addition to Nord Anglia Education’s commitment to the UN convention on the rights of the child, Country Day School has used the safeguarding standards set by the international safeguarding organization “Keeping Children Safe” to benchmark against; and the UK schools’ statutory guidance ‘Keeping Children Safe in Education’ (September 2019).

This overarching safeguarding/child protection policy should be read in conjunction with the NAE recruitment policy, whistleblowing policy, code of conduct for all employees, NAE guidance for safe working practice, the NAE social media policy, allegations policy and any other related policies.

## Child Protection Policy Creation and Task Force

This Country Day School Child Protection Policy was developed by a task force of CDS staff. The work of this task force was made possible by Country Day School General Director and Board. The task force worked to develop and implement a comprehensive child protection program for children and staff at Country Day School. The task force

was led by Early Childhood principal, Keitsa Brisson. The Child Protection Task Force consists of the School Director, the Early Childhood, Elementary, Middle School and High School Principals, the Director of Learning, a representative from Human Resources, as well as all School Counselors. The Country Day School worked in conjunction with external consultant, [Francey Hakes](#), a former U.S. prosecutor and current child protection expert.

## Policy Statement

This CDS Policy on Child Safeguarding applies to all students, staff, faculty, after-hours staff, volunteers, and visitors to Country Day School. The school will partner with parents to promote an ambiance of trust, where students understand their rights and responsibilities to themselves and to each other, nourishing a caring and supportive learning community.

Country Day School is committed to the well-being of children. All young people need to know that there are adults in their lives who advocate for a safe, secure and nurturing environment. At CDS, teachers and employees fulfill the role of caregivers who ensure a child's confidence, development, and learning occurs in a safe environment that cultivates positive student growth. This includes keeping children safe from all forms of physical and emotional harm, as well as promoting positive social, emotional, physical and academic development for all individuals affected.

Specifically the Country Day School Child Protection Policy:

- Evaluates risks that exist;
- Promotes a positive school atmosphere that offers pastoral support to students;
- Trains employees/volunteers and students about the difference between appropriate and inappropriate behavior;
- Ensures that CDS personnel are trained to identify signs of child abuse and subsequently follow policies and procedures as a duty to report;
- Provides support for students who may have been abused, or who have been abused;
- Ensures that allegations of sexual abuse are handled in a sensitive, timely and effective manner and in accordance to all applicable laws
- Addresses the legal obligations of each employee to report abuse and/or suspected abuse;
- Provides employees/volunteers with specific strategies on how to prevent abuse;
- Prevents child abuse through increased, constant, awareness and education;
- Implements a specific curriculum that addresses issues related to the prevention and/or identification of child abuse

The Director General, House Principals and Senior Leadership Team must:

- Ensure that this policy and procedures are implemented across their school and followed by all staff and volunteers
- Allocate sufficient time and resources to enable the Designated Safeguarding Leads (DSL) to carry out their role effectively
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively
- Ensure that safeguarding is addressed through the curriculum
- Ensure the school site is secure
- Customize this policy for Country Day School
- Ensure that mapping of local legislation (including clarity on legal duties to report any child protection issue), guidance and supportive agencies is undertaken and added to this policy

- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy

### **Addressing Child Safety**

Country Day School seeks to be a safe haven for all students. For students who may be at risk of or experiencing abuse or neglect in any aspect of their lives, including on and off campus or in their home, CDS will act in accordance with this policy to assure child safety standards and obligations are met. As such, Country Day School will distribute this policy annually to all parents and applicants, will communicate this policy (in age-appropriate versions) annually to students, will provide access to training for staff, will make every effort to implement hiring practices to insure the safety of children, and will review the policy annually for compliance and effectiveness. We recognize that providing a safe environment for students includes safeguarding in the form of; community awareness and education, bullying prevention, and deterring abuse within the following interactions--child to child, adult to child, and/or adult to adult.

Country Day School is accredited by the Middle States Association. The following standards are required as an accredited school:

- 6.12 Due diligence conducted in the hiring process to ensure that all members of the staff are eligible and continue to be eligible to work with children.
- 6.13 Due diligence conducted to ensure that employees of providers of contracted services are eligible and continue to be eligible to work with children.
- 6.14 Due diligence conducted to ensure that volunteers are eligible and continue to be eligible to work with children.
- 6.16 Has a scheduled program of regular systematic professional training (for staff, contractors, and volunteers) on student safeguarding, child abuse prevention, identification, intervention, and reporting.
- 7.1 Regularly reviews and updates its written policies and/or procedural guidelines governing the school's provisions for the health and safety of its students, staff, and visitors.
- 7.2 Regularly reviews and updates its plans for responding to emergencies and crises.
- 7.6 Provides appropriate training for all staff members on implementing the school's emergency and crisis plans, including but not limited to handling accidents and illnesses, universal precautions for preventing the spread of infectious diseases, and child abuse prevention and reporting.
- 7.10 Provides staff with up-to-date and relevant health, wellness, and safety information and practices pertaining to the school's students and staff.
- 7.11 Has effective relationships with community organizations that are able to provide appropriate support, advice, and services related to health, safety, and child protection.
- 7.13 Has an effective system to control access to the school by visitors and other non-school personnel.
- 7.14 Implements policies, procedures and/or programs to promote awareness, prevention, and responsiveness to issues related to the social and emotional well-being of the students and staff.

For the purposes of the CDS CP Policy we adopt the following definitions of terms as outlined in the [Association of International Schools in Africa Child Protection Handbook](#)

**Definition of Terms:**

**Child Protection** is a broad term used to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and unintentional harm. In this document the term “child protection” applies to protection of children in international schools. Please note that this definition also includes harm to self.

**Child Protection Policy** is a statement of intent that demonstrates a commitment to protecting students from harm (to self and from others) and makes clear to all what is required in relation to the protection of students. It serves to create a safe and positive environment for children and to demonstrate that the school is taking its duty and responsibility seriously. This handbook considers that schools will provide appropriate child safety classes supported with a well-defined curriculum to increase children’s ability to understand abuse prevention.

**Child protection** concerns include suspected, alleged, self-disclosed, or witnessed abuse of a child by anyone associated within or outside the school which must be investigated and followed by appropriate action.

**Child Abuse** - According to the World Health Organization, child abuse constitutes “all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting 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.” A person may abuse a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional (e.g. school) or community setting; children may be abused by individuals known to them, or more rarely, by a stranger. Often children may experience multiple forms of abuse simultaneously, further complicating the problem. Most child abuse is inflicted by someone the child knows, respects or trusts. International school communities have unique characteristics of which school personnel must be aware in terms of the individuals who are around our children. School personnel should be knowledgeable of the potential reasons why children may not be able to talk about any victimization they might have experienced.

**Physical abuse** may involve hitting, punching, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing intentional physical harm to a child. (These symptoms could also indicate harm to self, such as, cutting and suicide ideation).

**Emotional abuse** is the persistent emotional ill treatment of a child so as to cause severe and adverse effects on a child’s emotional development. It may involve: conveying to children that they are worthless or unloved; that they are inadequate or valued only insofar as they meet the needs of another person; age or developmentally inappropriate expectations being imposed on children; causing children frequently to feel frightened; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may also occur alone.

**Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (i.e. rape) or non-penetrative acts. They may include non-contact activities, such as involving children in the production or viewing of pornographic material or encouraging children to behave in sexually inappropriate ways. Children involved in commercial sex work are victims of sexual abuse, whether they perceive themselves as victims or not.

**Neglect** is the persistent failure to meet a child’s basic physical or physiological needs, likely to result in serious impairment of the child’s health or development.

Some indicators of neglect • Medical needs unattended • Lack of supervision • Consistent hunger • Inappropriate dress • Poor hygiene • Inadequate nutrition • Fatigue or listlessness • Self-destructive • Extreme loneliness • Extreme need for affection • Failure to grow • Poor personal hygiene • Frequent lateness or non-attendance at school • Low self-esteem • Poor social relationships • Compulsive stealing • Drug or alcohol abuse

**Long term impact of unmitigated child abuse** The impact of child abuse can persist for a lifetime after the abuse has been committed. Some victims of abuse are resilient and thus manage to function and survive. Much research has established the relationship between long-term child abuse and life-time health and well-being, especially if the children do not get appropriate support to help them cope with the trauma. The most important point to consider is that children often are exposed to multiple forms of abuse and suffer a myriad of symptoms. Furthermore, all forms of abuse have the potential for long-term impact on the victims, and can affect the victim's ability to function as a human being. Abuse challenges the self-value, self-esteem, and sense of worth of its victims, rendering them hopeless, helpless and unable to live a complete life.

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

**Signs of offenders (students)** • Unusual interest in sex, sexualizing inanimate objects and activities • Does not stop sexual misbehavior when told to stop • Uses force and coercion in social situations • Unusual intensity when discussing sex and sexuality • Socializes with children much younger • Gives gifts, requires secrecy in relationships

**Signs of offenders (adults)** • Has “favorite” student or child • Attempts to find ways to be alone with children • Inappropriate language, jokes and discussions about students/children • Sexualized talk in the presence of students/children • Gives private gifts or has private chats on facebook/internet

## Ensuring Child Safety

### Risk Management

CDS recognizes its responsibility to analyze and evaluate risks in all areas of operations. CDS has in place numerous procedures to regularly monitor, assess, and reduce risks to all of its personnel, students, visitors to campus, as well as to the physical infrastructure. Procedures are in place and regularly practiced for emergencies caused through human intervention as well as natural disasters as laid out in the [CDS Emergency Protocol](#). Country Day School is a [firearm free campus](#). Security officers are contracted by the school and on campus at all times. Visitors must check in at security points before being permitted on campus. Staff and parents are issued identification cards. Bus monitors are placed on all school buses to manage behaviors that could lead to accidents. Students are supervised by adults on all areas of the campus. However, according to the [Private Tutoring Policy](#), students are not permitted to be tutored in a one-on-one situation by an adult in a closed setting. Standards for child safety are recognized and adhered to at CDS events that are off campus (outings, field trips, overnight events, sporting events, etc). All Country Day School outings have a minimum student teacher ratio and required supervision. See full details in [CDS Field Trip Policies Manual](#).

### Safe Recruitment

The School's Board of Directors and administration are responsible for ensuring that the school follows safe recruitment processes. The Country Day School has aligned with the [International Task Force for Child Protection](#) to guide our recruitment and screening practices for hiring. As part of the school's recruitment and vetting process, police and criminal background checks are sought on all staff. Where available, Sex Offender Registries are consulted and an Internet search conducted. As part of the interview process, teacher candidates are questioned about their motivations for working in education and asked to describe their personal and professional backgrounds. All interview questions regarding safeguarding are transcribed for record purposes and kept on file, including the name

and contact information of the referees and the interviewer. At least three references are checked for each applicant for any CDS position with personal follow up from the school to at least two references with specific questions on child protection. All outsourced staff (after school activities teachers, coaches, external therapists, etc.) has on file a current background check, a recent CV, as well as the signed CDS Code of Conduct for Educators.

### Single Central Record

As a best practice, Country Day School maintains a single central record of all pre-appointment checks, as a register. The Country Day School central record must include the following people:

- all staff/volunteers, including teacher trainees, agency and third-party supply staff who work at the school.

The single central record indicates if the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- Start date of employment
- Role

Identity:

- Name
- Address
- Date of Birth
- Evidence of photo ID, date seen and who checked by. Record what was seen (passport/ driving licence etc). Ideally schools should also see a birth certificate to match against the photo ID

Background checks:

- Evidence of qualification, date seen and who checked by. Record no if qualifications not needed for role. Make sure the original certificate proving the qualification is seen and recorded
- EEA/ prohibition order checks, (undertaken by regional HR team on all teachers who qualified within the EU area)
- Section 128 check (Only applies to EU citizens who are taking up positions as Principals or senior leaders)
- Background checks (must cover 10-year period – except as above - and all countries lived in over the last 10 years, include 3rd parties who have regular unsupervised contact with students)

Right to work:

- Visa etc – date seen and who checked by

References:

- There should be a minimum of 2 references. References should ideally be followed up by phone or email to confirm the author, with the date of the follow up recorded.

Responsibilities of all staff (including partner organizations and contractors having regular unsupervised contact with children, where regular is defined as once a week or more) ensure that all staff will:

- Ensure they are familiar with and follow this safeguarding policy and all other safeguarding related policies e.g. Codes of Conduct, guidance for safe working practice
- Be subject to safe recruitment processes and appropriate background checks prior to starting at the school/organization (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed)
- Be alert to signs and indicators of possible abuse
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL)
- At Country Day School the Designated Safeguarding Lead(s) are: Keitsa Brisson ([keitsa\\_brisson@cds.ed.cr](mailto:keitsa_brisson@cds.ed.cr)) and Karla Pennant ([karla\\_pennant@cds.ed.cr](mailto:karla_pennant@cds.ed.cr))
- Follow the procedures outlined in this document when/if concerned about any child

- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation
- Undertake appropriate child protection/safeguarding, safe recruitment training and on-line safety (and refresher training as required by Nord Anglia Education).
- All staff and volunteers need to recognize that if their behavior inside or outside the workplace breaches the Country Day School or NAE code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter

## Professional Code of Conduct

CDS has a written Professional Code of Conduct that requires all staff to exemplify the highest ethical standards and make constructive efforts to provide students with the optimal conditions for learning, health, and safety. In part, the Professional Code of Conduct states that the professional educator deals considerately and justly with each student, and seeks to resolve problems, including discipline, according to school policy and the law. In addition, the professional educator does not intentionally expose the student to disparagement, including but not limited to public humiliation, sarcasm, belittlement, and/or misuse of authority. The professional educator complies with written local school policies and applicable Costa Rican laws and regulations. The professional educator endeavors to understand and respect the different backgrounds of the members in our school community, including ethnicity, learning differences, country of origin, race, nationality, sexual orientation, gender identity, gender or beliefs. See the full CDS Code of Conduct for Educators in [English](#) or [Spanish](#), as well as the Code of Conduct for Support Staff in [English](#) or [Spanish](#).

All CDS faculty and staff are required to read, understand, and comply with all the terms of the following policies: the CDS Safeguarding Policy, the Nord Anglia [Guidance for Safer Working Practices](#), and the Nord Anglia [Managing Child Safeguarding Allegations Against Adults in Schools](#).

## Education

Research has shown that education is key in prevention of child abuse. We know that giving young children the accurate names of private parts, “safe”, and “unsafe” touches in a safety-based, developmentally sequenced Social Emotional curriculum provides children with adequate tools to communicate inappropriate physical contact and avoid proximity or behaviors that will put them at risk from potential offenders as well as an integrated curriculum which includes soft skills as well as other topics. The Country Day School follows the [CDS Social Emotional Curriculum](#) for educating children regarding their physical and emotional safety. Country Day School also commits to following the guidelines in the [Anti-Bullying Policy](#) to prevent bullying and has protocol in place for reacting to bullying. Country Day School will follow the Ministerio de Educacion Publica Anti-bullying protocols for [Early Childhood & Elementary](#) and [Middle & High School](#). Country Day School staff will provide regular workshops for parents in child abuse prevention and communication. While CDS provides students and parents with educational opportunities regarding child safety, it is important to note that the protection and education of children is a partnership between the family, the child, and the school.

Some interesting Myths versus Facts regarding child protection and abuse from [Association of International Schools in Africa Child Protection Handbook](#) :

### **Myths vs. Facts**

**Myth:** Child abuse is carried out by strangers. **Fact:** Research indicates that 90% of abuse is from domestic causes and is committed by individuals known to the child. International school communities tend to have families that

move often and are separated from their extended families in their home-of-record. When abuse is within the family, the transient life-style then increases the risk to international school students who tend not to have access to outside resources, and therefore cannot get help.

**Myth:** Learning about child protection is harmful to your children. **Fact:** Research indicates that developmentally appropriate education makes children more confident and able to react to dangerous situations. Teaching using a specific population context increases protective behavior.

**Myth:** Abuse education is sex education. **Fact:** Research-based programs prepare students to develop the skills and attitudes to keep themselves safe from perpetrators, and behaviors that include bullying, harassment and other forms of exploitation.

**Myth:** Abuse is a matter of culture; physical or sexual abuse falls within the norms of some cultures and is acceptable. **Fact:** The reality is that there is no excuse for child abuse! No culture supports harming children. **Myth:** Child abuse is a result of poverty and happens in low socioeconomic circumstances. **Fact:** Research indicates that child abuse occurs in all racial, ethnic, socioeconomic, and cultural sectors of society. A common characteristic of an abusive family is isolation, such as that commonly found in our international school families who move often or are separated from their extended families at home.

**Myth:** International Schools do not have to report abuse to local authorities. **Fact:** International schools are bound by the laws of the host country and as such, international schools must be knowledgeable and compliant with the child protection laws in their locale. Furthermore, international schools are legally and ethically liable for any violation of existing laws related to reporting of cases of abuse or neglect; there are cases now pending where schools are facing legal action in regard to non-compliance.

## Safe Program Design

Students and teachers come to CDS from many different cultures and ethnic backgrounds, races, religions and experiences. In creating an environment of mutual respect and safety, the school's efforts include communicating clear behavior expectations, supporting educational programs that address tolerance and learning, sponsoring events celebrating diversity, and providing clear consequences for those who undermine the safe, respectful environment. The school will not tolerate harassment and bullying by any member of the community, student, teacher, administrator, parent, school or contractual staff, or visitor on the premises or at events sponsored by the school. Harassment and bullying may include, but are not limited to, behavior based on a person's actual or perceived race, religion, nationality, color of skin, gender, sexual preference, physical handicaps or physical appearance.

Student physical safety was also carefully considered when designing the campus, especially play and sports areas, as well as all buildings and recreational facilities. All doors are either completely glass or, when they are not, include an uncovered window in the door (except for bathrooms). There are cameras at all bathroom entrances. All bathrooms in school are designated as either "adult" or "student"; adults and students do not share bathrooms during regular school hours. Adult supervision is required in all areas populated by children during the school day and during after school programs, including inside buildings and in recreational areas.

In the case of challenge, sport, or academic field trips or any other event that takes place off campus, the primary consideration in planning is the safety and well-being of the students and staff. The nature and degree of any risks are examined and communicated to relevant parties. Staff chaperones and coaches are expected to minimize risks to a reasonable level and when necessary, arrange for certified people to assist with planned activities.

## **Management Responsibilities**

The Child Protection Task Force, and thereafter the Child Protection Team, has the responsibility to recommend to the General Director all necessary financial, physical, and human resources to fully implement the Child Protection Policy via the School Director. The Child Protection Team manages the implementation of this policy.

Implementation of this policy includes the following training and support for all faculty, staff, third party vendors, and volunteers:

- All staff and volunteers are provided with appropriate general (basic) safeguarding training on joining the organization and then at least every two years. This training will be available through Nord Anglia University (NAU) and other online platforms, as well as face-to-face events. In addition, all staff will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) and, at least annually, be provided with relevant skills and knowledge to safeguard children effectively
- Relevant policies are made available in a range of relevant languages
- Staff and volunteers are supported and have the necessary skills to recognize and take appropriate action regarding students who are at risk, or potentially at risk
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional (on-line safety training for example and specialist (level 3) training, (approved by the Education Director/Head of Safeguarding). This will be refreshed every two years
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student
- Appropriate staff are trained in safe recruitment. This safe recruitment training is renewed every five years
- Training for new starters is complete before any new starter can have unsupervised contact with students
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counselors or external agency input.

## **Budget Implications**

The school allots financial resources for start-up and regular training and education, security measures, as well as providing outside experts on an as-needed basis.

## **Reporting Suspected Abuse and Neglect and Actions after Disclosure**

Where there is cause to suspect child abuse or neglect, it is the responsibility of the staff member to report their suspicions to the counselor and/or principal or one of the school's Designated Safeguarding Leads (DSL). All staff, faculty and administrators are mandated to report incidences of abuse and neglect. In all cases, the house principal and counselor will be notified and aware of the incident, unless the allegation involves this staff member.

Confidentiality is maintained by all parties. Country Day School will use the following guidelines as a general protocol, noting that each case will have unique and specific circumstances resulting in variance in how each situation is addressed.

In cases where the endangerment is suspected to be occurring at school, the alleged violator will be immediately removed from campus and be prohibited from contact with students. A Response Team (RT), a sub-committee of the Child Safeguarding Team, will be created to review all information to verify reasonable cause; the RT will be comprised of the house principal, counselor, general director and/or one additional house principal, and any

additional members necessary. Within 24 hours of disclosure, the Response Team (RT) will assemble all reports, using an external expert for counsel as deemed necessary, and inform the parents directly involved. The DSL or General Director will inform the Regional NAE Manager of the case as soon as all relevant facts have been gathered. The affected individuals and family may be referred for external support.

In cases where there is reasonable cause, and the allegation is of criminal conduct, the school must report the case to the local authorities immediately, as required by law.

In all cases, the RT must determine if there is reason to believe there could be other victims. If not, then the investigation is closed. If there is reason to believe there could be other victims, the RT, with the guidance of an external expert, will conduct an internal investigation to canvas for further victims. The RT will follow the given protocol with each victim, including possible external expert investigation and/or reporting to local authorities. The school legal counsel will be relied upon to determine if reporting to the authorities is required at any given point. The Regional NAE Manager will be informed and consulted. If the RT cannot reach a decision at any point in the process, then the DSL and/or Director will take the matter to the Regional NAE Manager for a final determination.

Communications regarding the incident will be sent to the student community via Child Safeguarding Team and/or General Director. As soon as legal counsel approves communication, an all-community communication will be sent to families and stakeholders notifying them of the general circumstances related to the incident and the status of the employee. In that communication, information regarding an open meeting will be provided as an opportunity for the community to come together for awareness. The goal is for this meeting to be held within 48 hours of the all-community communication. In all cases, what is communicated must obey all applicable laws, including but not limited to: child protection law; employment law; defamation jurisprudence; and respect the privacy rights of the parents and possible victims.

In situations involving violations within the home, the Response Team will report all pertinent information to appropriate local authorities within 24 hours.

All cases that reasonable cause is determined, the School shall report its findings to the local legal authorities as mandated by the Ministerio de Educacion Publica for [Early Childhood & Elementary](#) or [Middle & High School](#).

In all cases considering how to manage allegations against adults, the CDS Child Safeguarding team and policy will defer to the Nord Anglia [Managing Child Safeguarding Allegations Against Adults in Schools](#) policy, as well as Costa Rican [National Child Protection Legislation](#).

## Reporting Contacts

Contact Person: Lic. Rodolfo Meneses Lopez - Centro de Orientaition e Information

Verbal report

- Center for Guidance & Information (COI/IOC) M – F, 7:30 Am – 4:00 PM

2523-0770, 2523-0800, 2523-0900

Online report

- 24-hour

- <http://www.pani.go.cr/>

(Home page – bottom left – Complaints & Queries

- <http://www.pani.go.cr/servicios/denuncias-en-linea>

## **Allegations Against Staff and Volunteers**

An allegation can be made against a staff member or volunteer at any point. All allegations are treated seriously and appropriate procedures followed. All allegations must follow the [Managing Child Safeguarding Allegations Against Adults in Schools](#) policy.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child
- Where someone has possibly committed a criminal offence against a child
- Where someone has behaved in a way towards a child or children that would pose a risk to children

## **Peer on Peer Abuse**

Country Day School staff recognizes that children are capable of abusing their peers and must be able to identify concerning sexualised behaviour and know when to refer these concerns to the DSL.

Peer on peer abuse is abuse and is never tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. All Country Day School staff recognize the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys’ perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously. Country Day School staff understand the different forms peer on peer abuse can take, such as:

- sexual violence and sexual harassment
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexting (sexually explicit photographs or messages via mobile phone.)

Allegations of peer abuse will be recorded, investigated and dealt with following the guidelines outlined below.

All staff, faculty and administrators are required to report incidences of peer on peer abuse. It is the responsibility of the staff member to report their suspicions to the counselor and/or principal or one of the school’s Designated Safeguarding Leads (DSL). In all cases, the house principal and counselor will be notified and aware of the concern. A Response Team (RT) will be assembled to complete an investigation. The parents/family of the perpetrator and victim will be notified and the student(s) will be supported either through an emotional safety plan as outlined by the house counselor or through external therapy. Any other children who are affected by the abuse will be offered support by the house counselor, implementing emotional safety plans as necessary. The house principal and general director will work with the perpetrator and the family of the perpetrator regarding disciplinary actions, or expulsion/criminal reporting when appropriate.

## **Suicide/Self Harm Prevention and Protocols**

Country Day School recognizes the threat to child welfare that self-harm and suicide potentially pose. To this end, we follow a full [Suicide/Self-Harm Protocol](#) which addresses prevention, warning signs, as well as protocol to be followed in the case of self-harm or suicide (threatened, attempted, or consumated).

## **Policy Implementation and Review**

Country Day School recognizes the importance of transparency and frequent review regarding our Child Protection Policy and Procedures. We have established a series of measures and mechanisms to monitor policy and practice effectiveness, as well as ensure accountability of implementation at all levels of the school. The implementation of our policy is broken down in the following guidelines to advise our practices:

### Communication with Staff and Employees

The CDS Child Protection Policy, along with the Code of Conduct, will be distributed and revisited with all staff members on an annual basis. All staff members will be provided with a full explanation and copy of the Nord Anglia [\*Allegations against Adults- Preliminary Actions\*](#). School employees will be required to sign an annual agreement citing that they have reviewed, understand, and will implement the school-wide policy.

### Communication with Parents and Families

Our Child Protection Policy will be shared with families via divisional handbooks, and will be accessible to all stakeholders and families of interest on the school webpage (logged in site). Country Day School will offer bi-annual workshops in congruence with our Child Safety Curriculum to educate families on how to prevent abuse, including the signs of abuse, how to appropriately talk to their children, and how to report any suspicions of possible abuse.

### Education, Training and New Staff Onboarding

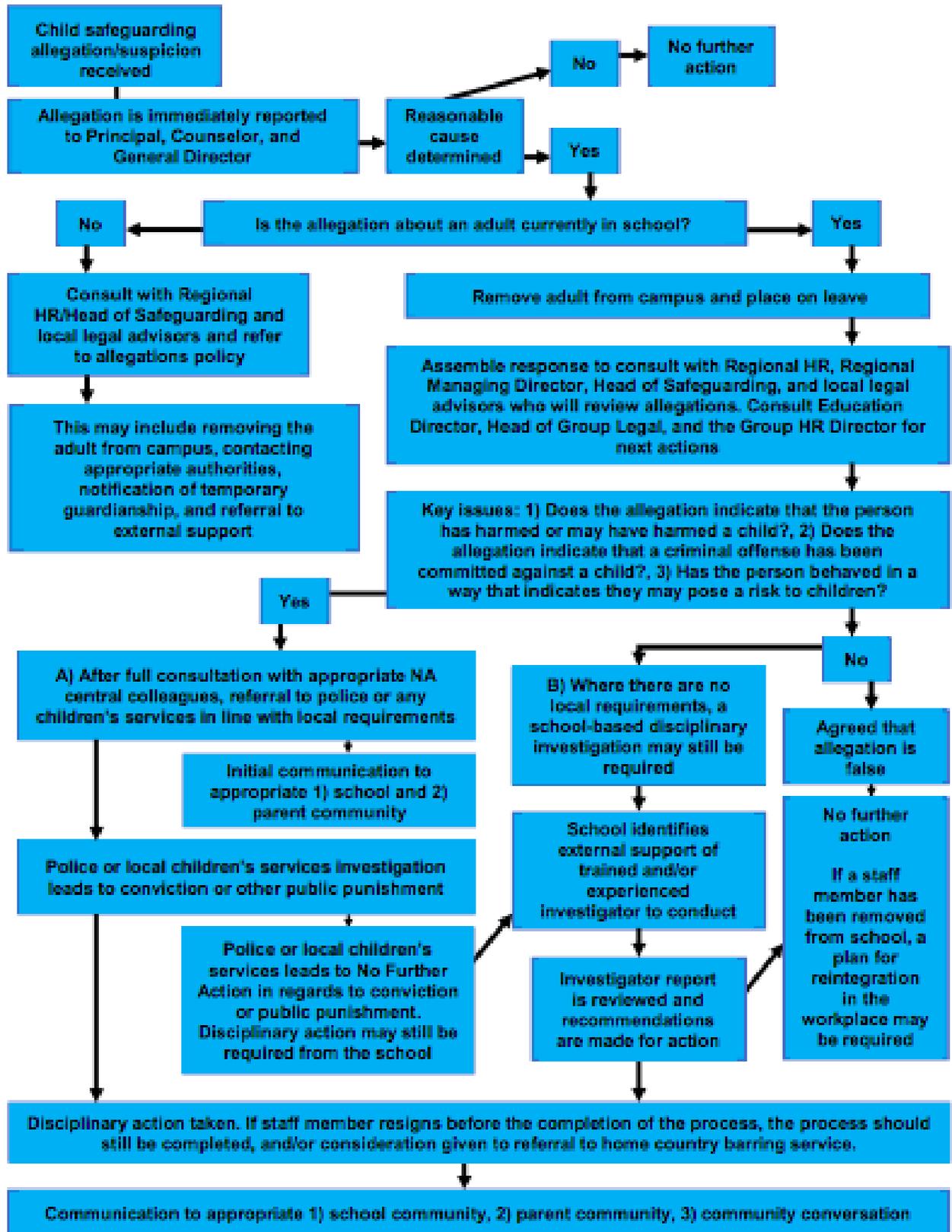
The Country Day School will provide comprehensive staff training each school year to equip our employees with the knowledge and protocols in safeguarding our children. This education will include guidelines for daily practices, recognition of signs of possible abuse, reporting procedures, and strategies in supporting our children that have expressed risk of abuse. The Country Day School Counselors will receive additional training to properly handle response to child abuse, response to disclosure of abuse and to give proper education to students and parents. On an annual basis, all new staff members will be provided with this training to appropriately onboard them in administering the expected protocols.

### Child Protection Team

The Child Protection Team will consist of the School Director, the Early Childhood, Elementary, Middle School and High School Principals, the Director of Learning, a representative from Human Resources, as well as all School Counselors. In handling reporting/disclosure protocol the Response team, a sub-committee of the Child Protection Team, will be created. This team will be comprised of the house principal, counselor, general director, one additional principal, and any additional Child Protection Team members necessary. The CDS Child Protection Team will conduct annual internal audits as well as periodic external audits of the policy and procedures in place. The team will perform an annual review which will focus on both the number of cases that are brought forth, as well as how our systems and procedures are working to prevent abuse from taking place.

CDS will use the following tools to assist in Monitoring Policy and Implementation Effectiveness: annual internal audits in congruence with our safeguarding standards and Nord Anglia Education requirements, biannual external audits, monthly safety checks, regular feedback from staff, parents, and students via surveys and family education sessions, regular data collection from frequent campus walkthroughs and incident reports.

# Incident Flow Chart



## Auditing, Reporting, Review and Sign off

To support the implementation of the Safeguarding and Child Protection Policy and to enable schools to undertake a 'Safeguarding Health Check', schools will be provided with a self-assessment tool to enable review of their safeguarding arrangements. It is expected that all schools will undertake and submit this assessment to the Head of Safeguarding every year. A random selection of schools will be reviewed in more depth. Schools may be supported by the Head of Safeguarding to both complete the assessment and plan actions where necessary.

Elements of safeguarding practice in schools will also be included in the quality assurance framework and will continue to be an element of the school's Health and Safety review and NAE's audit process.

This policy is owned by all our schools and is made available to students and parents/carers alike in hard copy where requested, but also through the school's own website and the Nord Anglia Education website. The policy will be translated into key languages.

This policy will be reviewed and updated on a regular basis but at least every two years.

Senior staff in schools should adopt and sign this policy after each update. A copy of the revised policy should be made available to all staff, volunteers, parents/carers and students.

Signed and dated by the CEO (or delegate) on behalf of Nord Anglia Education

*Ann McPhee* 2-18-2020

Signed and dated by School Director General

*Scott Adams* 2.14.20

Signed and dated by the school Designated Leads for Safeguarding

*Paula Bennett* Resources 2-14-2020

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*Keenan Brown* 2-14-2020

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