Child Protection Policy and Procedures

Introduction

Okinawa Christian School International (OCSI) is an Associate Member of the Child Safety & Protection Network (CSPN). CSPN is a collaborative network of mission agencies, faith based NGOs (non-governmental organizations) and international Christian schools intentionally and strategically addressing the issues of child protection.

OCSI’s Child Protection Policy has been developed with the purpose of creating a safe environment where students are protected and treated with respect and dignity. When given reasonable cause to suspect that the rights of children are violated, OCSI will seek all available resources to restore those rights.

Child Protection Policy

1. OCSI shall maintain a school environment free of child abuse and neglect.
2. No teaching staff, support staff, volunteer, or student may engage in any activity at any time constituting child abuse or neglect.
3. OCSI mandated reporters are obligated to report any suspected child abuse or neglect, both in and out of the school setting. Reports may also be received from students and parents.
4. Abuse will not be tolerated at OCSI, whether the abuse occurs child to child or adult to child. Child to child cases will be evaluated on a case-by-case basis. Should both the harmed child and the child that caused harm be under the age of 18, the behavior will typically be considered abusive behavior if there is a significant difference in age, responsibility, trust, power, development, awareness or understanding. If this is not the case, what would normally be defined as abusive behavior will be considered inappropriate behavior.

Definitions

1. Abuse: Actions that may be considered abuse include, but are not limited to:
   - Physical Abuse: physical injury inflicted by other than accidental means upon a child by another person and includes willful cruelty, unjustifiable punishment, or willful infliction of physical pain. Examples of physical abuse include: hitting, spanking, shaking, slapping, any behavior that assaults a child; pushing or restraining a child outside the goals of protecting them or others from danger or providing medical care.
   - Verbal Abuse: degrading, ridiculing, yelling at a child or using other forms of hostile language.
   - Sexual Abuse: sexual assault or exploitation of a child. Examples include: inappropriate touching, exposing oneself, and sexually inappropriate conversations.
   - Grooming: befriending and establishing an emotional connection with a child, and sometimes the family, to lower the child's inhibitions and to gain their trust for the purpose of sexual abuse, sexual exploitation or trafficking. This can be done face-to-face or online.
   - Mental Abuse: shaming, humiliation, cruelty.
   - Neglect: failure to provide appropriate care and/or protection in circumstances indicating harm or threatening harm to the child’s health or welfare. Examples include: inappropriate isolation or withholding medical care, food, water, or shelter.

2. Bullying: Bullying is unwanted, aggressive behavior that involves a real or perceived power imbalance. The behavior is repeated, or has the potential to be repeated, over time. Types of bullying include, but are not limited to:
   - Verbal bullying is saying or writing mean things. Verbal bullying includes teasing, name-calling, inappropriate sexual comments, taunting, and threatening to cause harm.
   - Social bullying, sometimes referred to as relational bullying, involves hurting someone’s reputation or relationships. Social bullying includes leaving someone out on purpose, telling other children not to be friends with someone, spreading rumors about someone, and embarrassing someone in public.
Physical bullying involves hurting a person’s body or possessions. Physical bullying includes hitting/kicking/pinching, spitting, tripping/pushing, taking or breaking someone’s things, and making mean or rude hand gestures.

Cyber bullying is bullying that takes place using electronic technology. Cyberbullying can happen 24 hours a day, 7 days a week, and reach a kid even when he or she is alone. It can happen any time of the day or night. Cyberbullying messages and images can be posted anonymously and distributed quickly to a very wide audience. It can be difficult and sometimes impossible to trace the source. Cyber bullying includes mean text messages or emails, rumors sent by email or posted on social networking sites; embarrassing pictures, videos, websites, and fake profiles.

3. Exploitation: any activity that takes advantage of a child that could harm his/her welfare and development. This includes, but is not limited to, sexual or commercial exploitation.

4. Harassment: unwanted, offensive and intrusive behavior usually with a sexual, racial or physical component.

5. Self-harm: the deliberate infliction of damage to one’s own body and includes cutting, burning, and other forms of injury.

6. Suicidal Ideation: thoughts about how to kill oneself, which can range from a detailed plan to a fleeting consideration and does not include the final act of killing oneself.

Guiding Safeguards

Whenever possible, all three guiding safeguards of visibility, accountability, and appropriate use and balance of power govern our behavior. When one principle is not possible to achieve because of circumstances outside the staff member’s control, the other two principles are of utmost importance. The safeguards apply to relationships with students at any time, both on campus and off campus. OCSI staff members are always bound by these principles.

1. Visibility
   A. Scriptural basis: “But whoever lives by the truth comes into the light, so that it may be seen plainly that what they have done has been done in the sight of God” (John 3:21).
   B. “Is it possible for others to see me?” When interacting with children, adults position themselves in a place that is visible to other unrelated adults. This can be accomplished by such things as planning activities in areas where other adults are present, staying within view of a window, or keeping doors open.

2. Accountability
   A. Scriptural basis: “And let us consider how we may spur one another on toward love and good deeds, not giving up meeting together, as some are in the habit of doing, but encouraging one another—and all the more as you see the Day approaching” (Hebrews 10:24-25).
   B. “Do others know where I am or what I am doing?” One-on-one interactions with a child should only occur in situations where other unrelated staff members are in the vicinity. If a staff member needs to drive a student home, parents or guardians should be phoned beforehand.

3. Appropriate Use and Balance of Power
   A. Scriptural basis: “But in your hearts revere Christ as Lord. Always be prepared to give an answer to everyone who asks you to give the reason for the hope that you have. But do this with gentleness and respect” (1 Peter 3:15).
   B. “Do students feel safe in my presence?” Adults, by virtue of their age, size, strength, and authority, exert control over children. Balancing control enhances child safety. This can be accomplished by
avoiding one-on-one situations as much as possible. An example would be driving two students at a time, dropping off siblings last when driving students home, or sitting down when talking to a child so your head levels are equal.

Additional Safeguards

Each of the following safeguards further improves safe interactions within the school community.

**Discipline** should be used to teach and correct rather than punish. The following actions cause harm to a child and are to be avoided:

- Derogatory name-calling, ridicule, humiliation, shaming, publicly singling out a child for negative treatment or exclusion, yelling at a child, or other forms of hostile treatment
- Hitting, slapping, or any behavior that harms a child
- Pushing or holding a child against his/her will outside the goal of protecting the child from danger, providing medical care, or keeping the child from harming him/herself or others

**Touch** should be in response to the needs of the child and not the needs of the adult. Side hugs or shoulder-to-shoulder hugs are generally appropriate. Chest-to-chest full body frontal hugs should be avoided in order to teach children healthy touch. The following actions cause harm to a child and are to be avoided:

- Touching buttocks, chests, genital areas, or thighs except to keep young children clean or healthy
- Any touching not conducted in a public place
- Any form of affection that is resisted or unwanted by the child
- Any behavior that could be interpreted as sexual in nature, including flirtatious or seductive looks
- Assisting the child with anything of a personal nature that children are able to do themselves, including dressing and bathing

**Communications** should always be wholesome and above reproach and in line with OCSI’s Communication Policy. The following communications, written, online, video or photographic, cause harm to a child and are to be avoided:

- Shaming, belittling, humiliating, name-calling
- Using harsh language that may frighten, threaten or humiliate the child
- Cursing or making derogatory remarks about the child, their family, and/or their place of origin
- Inappropriate comments that relate to physique or body development or any sexually suggestive comments or pictures
- Favoring particular children to the exclusion of others, or excluding children in a derogatory or embarrassing way in the presence of others

**Safety and Prevention**

OCSI Administration will ensure that child protection policies and procedures are in place and are followed, to plan and implement relevant training for staff and education for students, to maintain a clear reporting mechanism, and to respond to any reports of harm to a child.

- As part of the application process for service at OCSI, applicants (staff and non-parent volunteers) will grant permission for OCSI to conduct a criminal background check and any other screening deemed necessary. Applicants with any registered misbehavior related to child abuse or history of domestic violence will not be permitted to serve at OCSI.
- All staff, volunteers, coaches, and contracted workers with regular recurring responsibilities on campus will read this policy and sign the code of conduct. Families of OCSI students will have access to this policy. The policy is on the school’s website for public access.
- All students will receive age appropriate child safeguarding instruction and relevant education related to reporting abuse. A reporting form is available on the OCSI website for public use.
OCSI staff are responsible to provide the type of supervision that will safeguard all students by following OCSI’s Code of Conduct for Child Protection. Training on Child Protection is required for all staff and volunteers on a yearly basis.

- Guidelines for various programs (i.e. field trips, overnight retreats, and mentoring) must be in place and implemented.
- Technology, such as internet filters and video surveillance systems, are used to further protect children.
- Administrators periodically and randomly inspect classrooms, offices, and other areas to verify compliance with these safeguards. All classrooms have windows to provide visibility.

### Child Protection Response Procedures

#### 1 Type of Behavior & Appropriate Response Chart

<table>
<thead>
<tr>
<th>Severity of Concern</th>
<th>Examples</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concerning Behaviors</td>
<td>lying, cheating, plagiarism, misuse of technology, inappropriate language, disrespect, gossip/slander, mocking/teasing, disobedience</td>
<td>Behavior responded to by teacher; log concerning behavior in Jupiter and report to principal when appropriate.</td>
</tr>
<tr>
<td>Serious Behaviors</td>
<td>stalking, bullying or threatening behavior between peers or toward younger students, physical fighting, discrimination, repeated misuse of technology, harassment, threatening or violent behaviors, possession of weapons, gang activity, possession of tobacco, alcohol, drugs, or pornography; indicators or disclosures of the above behaviors</td>
<td>Behavior reported immediately to principal; Child Protection Team notified when appropriate; log serious behavior in Jupiter.</td>
</tr>
<tr>
<td>Extreme Behaviors: Abuse</td>
<td>abuse (physical abuse, sexual abuse, emotional abuse, neglect or exploitation); inappropriate behavior/relationships between adults and students; non-consensual, exploitative or concerning sexual activity and anything below 16; possession or distribution of child pornography, including nudes and sexting; abusive/inappropriate online communication</td>
<td>Behavior reported immediately to Principals and Child Protection Team.</td>
</tr>
<tr>
<td>Extreme Behaviors: Internalized</td>
<td>symptoms of depression, self-harm, suicidal ideation, indicators for eating disorders, substance abuse, indicators or disclosures of the above behaviors</td>
<td>Behavior reported immediately to counselor and/or principal; Child Protection Team notified when appropriate.</td>
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</tbody>
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#### 2 Receiving and Reporting Concerns & Allegations

When abuse is disclosed or reported, the adult must treat the reporting person with an attitude of respect and belief. Even if there is reason to doubt this report, the staff member or volunteer receiving the information must communicate the details accurately and completely within 24 hours. There must not be any attempt to handle the situation privately or enter into any private agreement with the person who allegedly caused the harm or the reporting person. During this reporting process care must be exercised to protect the person harmed, the reporting person, and the person who allegedly caused the harm, by restricting
information access to those who need and have the authority to know. Safety assurance and assistance may be provided for reluctant or scared reporters.

Any staff member or volunteer who 1) has an indication of concern regarding child safety, 2) receives a disclosure of harm, or 3) discovers alleged abuse amongst staff and/or students regardless of where it may have occurred must fill out a confidential, written report using the Child Protection Reporting Form on OCSI's website.

Upon receipt of a report, the Principal will inform the Head of School and the Child Protection Team as needed, will review all reports and determine the appropriate response according to school policy. Parents will usually be informed after their student has been interviewed.

Staff, volunteers, students, and family members are expected to fully cooperate in any response. Anyone who conceals information or knowingly provides false or misleading information will be subject to appropriate disciplinary action up to and including dismissal or termination of enrollment.

3 Historical Reports
OCSI is committed to taking all reports of harm to children seriously whether past or present. OCSI will respond to reports of abuse, no matter how old, because of the importance to the person harmed, other children, and the organization itself. In such historical cases (i.e. more than three years after the abuse occurred and where the victim is now an adult), the harmed person must be willing to make a formal report to the Child Protection Team or there must be an eyewitness account of the abuse by a third party.

4 Child Protection Response Process
OCSI will comply with Child Safety and Protection Network recommendations for responses which may include an Initial Assessment, a Child Safety Assessment, and a Misconduct Assessment.

OCSI will fully respond to every report of child abuse in a timely manner. A response team will be composed of at least two people usually representing both genders who have received the CSPN response training.

- In cases where a staff member, student, volunteer, or parent has allegedly harmed a child, the Child Protection Team will conduct the response.
- In cases where the Head of School or a member of his/her family has allegedly harmed a child, the Board Chair will be notified and involved in the process. A CSPN responder from outside the organization may be appointed to conduct the response.

The response will be guided by the following principles:

- The Mission Organizations and/or Board Chair may be consulted during the response process for staff misconduct assessments. The police will be contacted if a crime has been reported.
- Priority will be given to providing immediate safety for the child harmed. The nature of the report may necessitate that a staff member be relieved of duties and removed from campus or a student be temporarily removed from the school premises. Every effort will be made to provide appropriate support during the response process for the child who was harmed and the adult or child who allegedly caused the harm.
- CSPN recommended interview guidelines will be used when gathering relevant information. Interviews will be conducted by a CSPN-trained responder unless it is deemed important to bring in an outside specialist if interviewing a child would cause more trauma. The rights of the child will be adhered to at all times. In most cases, parents will be notified after their child has been interviewed.
- Every effort will be made to protect the privacy of all the parties involved.
- The response team will maintain a neutral stance toward the person who has caused the alleged harm until the response process has been concluded.
- The response team will maintain a climate of belief, meaning that harm could have taken place.
For additional guidance, see the Child Protection Response Flowchart below.

**Child Protection Response Flowchart Overview**

**INITIAL ASSESSMENT**
- Principal gathers Response Team and starts documenting all information and action.
- Plan, gather information (interviews, records check), analyze information & outcome decision.
- Police & relevant organisations possibly notified and involved.
- Parents will be informed if their students are interviewed.

Does this warrant further child safety assessment and/or misconduct assessment?

- Yes
- No

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**Written report on Initial Assessment.**
- Possible action plan recommendations submitted to HOS.
- If implemented, Principal will monitor action plans.
- Initial Assessment report filed in HOS's secure storage.

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**Further response continues.**
- Plan continued response.

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**CHILD SAFETY ASSESSMENT**
- Plan & gather information (interviews)
- Analyze information
- Assessment with Child Safety Tool
- Outcome decision
- Child Safety Plan for every student

**MISCONDUCT ASSESSMENT**
- (For OCSI staff members & volunteers)
- Plan & gather information (interviews)
- Analyze information
- Misconduct Assessment Tool
- Outcome decision
- Misconduct Findings Report

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**STATEMENT OF FINDINGS** submitted to Head of School.
- Head of School makes final decisions related to action plans and recommendations with relevant teams.
- Principal may be consulted.

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**Child Protection Team & Principals**
- Monitoring of Child Safety Plan
- Monitoring of Action Plans
- Assist with final communications
- Team debriefing & process review with possible auditing from outside
- Submit Organizational Improvement Plan

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**HEAD OF SCHOOL**
- Administrative discipline action
- Communication of final decisions
- Organizational Improvement Plan decision
- All files in Head of School's secure storage
**Closing the Response**

After the Child Protection Team completes the Initial Assessment, the Child Safety Assessment and/or a Misconduct Assessment, a Statement of Findings will be submitted to the Head of School and usually the Principal. The Statement of Findings will also include a recommended Action Plan. The Head of School will evaluate the findings and make any final decisions related to the recommended Action Plan, Child Safety Plan, or Misconduct Assessment.

In confirmed cases of abuse, the Action Plan will mandate the following outcome:

- In every confirmed case of child abuse committed by a staff member, the Head of School will terminate the staff member’s service with no possibility of reinstatement. The Child Protection Team will report these cases where applicable to the staff member’s sending agency, certification agency, the local police and social services, and any appropriate government agency in the staff member’s passport country. Furthermore, the Head of School may inform the school community.
- In confirmed cases where a child has been abused by a volunteer or parent of a student, whether the abuse occurred inside or outside OCSI’s jurisdiction, the offender will be denied further opportunities for volunteer service and may be denied entry to school facilities.
- Confirmed cases of abusive behavior committed by a student will be evaluated on a case-by-case basis, taking into account such factors as age, seriousness of the offense, acknowledgment of responsibility, and effective treatment and may result in immediate termination of enrollment.
- If OCSI becomes aware that an abusive former staff member or adult volunteer is employed or volunteering at another organization and has access to children, OCSI will normally inform that organization of the confirmed offense(s).

The Head of School, in consultation with the response team and Child Protection Team, will release appropriate information to any relevant parties and/or the affected community. Counseling may also be offered to the community when appropriate. Finally, the Head of School will meet with the Child Protection Team to review the child protection policies and procedures. All paperwork related to the response will be stored in secure storage.