

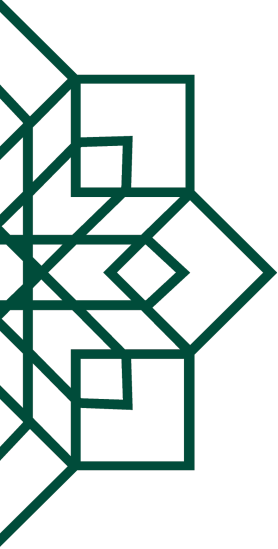


**AMERICAN COMMUNITY SCHOOL**  
OF ABU DHABI *SINCE 1972*

# ACS Student Safeguarding and Child Protection Procedures Handbook

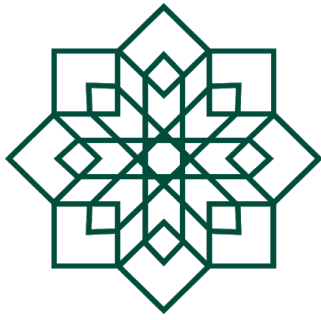
*Learning in a Caring and  
Connected Community*

Updated: August 2020



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# AMERICAN COMMUNITY SCHOOL

OF ABU DHABI *SINCE 1972*

**Mission:** *Our community empowers all students to define and shape their futures for learning, service, and global citizenship.*

**Vision:** *Together we are a compassionate, student-centered community of learners that engages, prepares, and inspires.*

**Core Values:** *Courage. Curiosity. Compassion. Integrity.*

ACS community members,

I am writing a personal introduction to this policy document to increase your awareness of the importance of child protection and to highlight ACS's commitment to student safeguarding. I am required to communicate this important policy yearly and oversee the continual review of these critical processes and procedures.

This document is in alignment with the United Nations Convention on the Rights of the Child to which the United Arab Emirates is a signatory as of January 1997, on the UAE Federal Law number 3 of 2016 (Wadeema's Law), and the Abu Dhabi Department of Education and Knowledge (ADEK) child protection policy.

By joining the American Community School of Abu Dhabi's community you agree to work in partnership with the school and to abide by these policies and procedures. To ensure a safe environment where all our children can learn and grow we must take a shared responsibility between home and school.

Please take the time to review the contents of this handbook, and let your child's counselor, principal or me know if you have any questions about our commitment to work in partnership to protect children.

Thank you for your support,  
*Monique Flickinger*

## THE AMERICAN COMMUNITY SCHOOL IS COMMITTED TO:

- Protecting students against any physical abuse, emotional abuse, sexual abuse and exploitation, neglect, and/or peer on peer abuse.
- Identifying at-risk students and taking action to prevent reasonably foreseeable harm.
- Reporting when there is reasonable suspicion of harm or risk of harm to students.
- Applying Safer Recruitment and hiring practices, including staff training.  
*(as defined in this child protection handbook)*

*Every suspicion or disclosure of abuse from within or outside the school will be taken seriously. Action will be taken by members of the Child Protection team and as appropriate may include referral to an external agency.*

## IMPORTANT DEFINITIONS AND WARNING SIGNS

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.” This also includes harm to self.

*A person may abuse a child by inflicting harm, or by failing to act to prevent harm. Most child abuse is inflicted by someone the child knows, respects, and/or trusts.*

*(Signs and Indicators may or may not be present and may or may not indicate abuse)*

**Physical Abuse:** any intentional, unwanted contact with one’s body resulting in actual or potential harm. Examples may include hitting (with hand or item), punching, shaking, throwing, poisoning, kicking, burning, drowning, suffocating, sustained physical activity, etc.

### Signs of Physical abuse that may or may not be present:

- Bruises, burns, sprains, dislocations, bites, cuts
- Improbable excuses to explain injuries
- Injuries that have not received medical attention
- Injuries that occur to the body in places that are not typically exposed to falls or rough games
- Repeated urinary infections or unexplained stomach pain
- Refusal to discuss injuries
- Withdrawal from physical contact
- Arms and legs covered in hot weather
- Fear of going home or parents being contacted
- Showing wariness or distrust of adults
- Self-destructive tendencies
- Aggressiveness toward others
- Overly passive and compliant
- Chronic running away

**Emotional Abuse:** persistent emotional ill treatment such as threats, insults, constant monitoring, humiliation, intimidation, isolation, or stalking that result in actual or potential harm to an individual’s health, physical, mental, and/or social development. Such behaviors may include restricting a child’s movements, developmentally inappropriate expectations being imposed, ridicule, threats and intimidation, conveying worthlessness, corruptions on child’s innocence, rejection and other non-physical forms of hostile treatment. *Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may also occur alone.*

**Signs of Emotional abuse that may or may not be present:**

- Physical, mental, and emotional development is delayed
- Highly anxious
- Delayed Speech or sudden speech disorder
- Fear of new situations
- Low Self-esteem
- Inappropriate emotional response to painful situations
- Extremes of passivity or aggression
- Drug or alcohol abuse
- Compulsive Stealing
- Chronic running away
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention-seeking behavior
- Persistent tiredness
- Lying

**Neglect:** persistent failure to provide for a child’s basic needs in one or more of the following areas: physical, medical, education, emotional development, nutrition, shelter and safe living conditions. This is likely to result in serious impairment of the child’s health or development.

**Some indicators of neglect that may or may not be present:**

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

**Sexual Abuse:** any action that pressures or coerces an individual to do something sexually that they do not want to do or cannot consent to doing (whether or not the child is aware of what is happening). This may involve physical contact that is penetrative or non-penetrative such as kissing, rubbing, or touching inside or outside of clothing. Activities may also include non-contact activities such as viewing sexually explicit material or encouraging children to behave in sexually inappropriate ways.

**Signs of Sexual abuse that may or may not be present:**

- Pain or irritation to the genital area
- Discharge from genitals
- Difficulty with urination
- Infection, bleeding or sexually transmitted diseases
- Fear of people or places
- Aggression, unusual aggressiveness
- Regressive behavior (bed wetting, stranger anxiety)
- Excessive masturbation or sexually provocative
- Stomach pains or discomfort walking or sitting
- Unusual quietness/withdrawn
- Physical ailments with no medical explanation
- Fear or distrust of particular adult
- Mentioning special attention or a new “secret” friendship with adult/young person
- Refusal to continue with school or usual activities
- Age inappropriate sexualized behavior or language

**Sexual Exploitation:** taking non-consensual, unjust, or abusive advantage of another in a sexual or intimate context. Children can be sexually exploited for money, power, or status. In some cases young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection, or status. Consent cannot be given (even when a child believes they are voluntarily engaging in the sexual activity). This exploitation does not always involve physical contact and can happen online.

**Signs of Sexual exploitation that may or may not be present:**

- Signs of Sexual abuse (see above)
- Unexplained gifts or new possessions
- Associate with others involved in exploitation
- Have older girlfriends or boyfriends
- Sexually Transmitted Diseases or possible pregnancy
- Changes in emotional well-being
- Fear of people or places
- Drug and Alcohol abuse
- Missing for periods of time or regularly come home late
- Regularly miss school or education

**Online Sexual Abuse and Exploitation:** sexual abuse of children using digital technology. This commonly include grooming children with a sexual motive, creating, viewing, and distributing child abuse material (child pornography and self-produces sexual images or 'sexts'), and coercing or blackmailing children for sexual purposes.

**Signs of Sexual exploitation that may or may not be present:**

- Secretive behavior
- Unexplained gifts or new possessions
- Late night or excessive internet use
- Anxiety
- Withdrawal from family, friends, or interests
- Suicide ideation or self-harm
- Poor educational achievement
- Increase in followers or contacts
- New devices and/or platforms
- New tech use patterns
- Avoidance of online use or certain online platforms or apps

**Sexual Harassment:** physical, verbal, written, or electronic conduct of a sexual nature that interferes with a person's academic or extracurricular activities, professional obligations, or creates an intimidating, hostile, or offensive environment.

**Digital/Electronic abuse:** the use of technology for digital communication to bully, harass, stalk, or intimidate another. Digital abuse is a form of verbal or emotional abuse perpetrated through online means of communication. Digital abuse may involve student-on-student or both students and adults.

**Long-term impact of unmitigated child abuse:** The impact of child abuse can persist for a lifetime after the abuse has been committed. Impacts are often academic, medical, physical, psychological and emotional. Research has established the relationship between long-term child abuse and lifetime negative health and well-being impact, especially if the children do not get appropriate support to help them cope with trauma and build resiliency.

### Long term impacts of child abuse:

- Poor educational achievement
- Inability to complete responsibilities
- Inability to live according to plan/ability
- Inability to care of self
- Inability to coexist, cooperate or work with others
- Lack of self-confidence
- Prone to addiction/substance abuse
- Inability to express love or accept love
- Constant health problems
- Prone to mental health problems
- Low self-esteem, depression, and anxiety
- Post-traumatic stress disorder (PTSD)
- Attachment difficulties
- Eating disorders
- Poor peer relations
- Rage disorders
- Self-harming behavior (cutting, suicide attempts)

**Child Protection:** the safeguarding of children from abuse and neglect; those systems, beliefs, structures in place to guard children’s rights and prevent and respond to the actual or suspected harm of children

**Child Protection Team (CPT):** a group of ACS employees tasked with receiving and responding to more serious reports of child protection violations within the community. The core CPT will include individuals from administration, counseling, the Director of Student Services, the school psychologist, a school nurse, and a teacher representative. The core CPT will request the presence of other members of the community as deemed necessary.

**Employee:** for the purposes of this policy, the definition of “employee” includes all those at ACS who directly or indirectly work with students, all externally hired and internally hired coaches, volunteers, substitutes, and all outsourced employees.

*(definitions adapted from: the Report of the Consultation on Child Abuse Prevention World Health Organization 1999 and the Association of International Schools in Africa ASIA Child Protection Handbook 2014)*

## REPORTING RESPONSIBILITIES

This policy mandates that all adults must report any suspicion of child abuse to a child protection liaison and follow the reporting pathway outlined in this policy, Page 9-10.

All Adults associated with the American Community School in Abu Dhabi have both a legal and ethical obligation to report incidents when there is reasonable suspicion of harm to a child. UAE Federal Law #3 of 2016, article 42 says “The notification shall be mandatory for educators, physicians, social specialists, or others entrusted with the protection, care, or education of the child.”

Adults who see, hear about, know about, or have suspicion of possible child abuse (physical, sexual, emotional) or neglect or is at significant risk of being abused must make a report. Reporting should occur as soon as possible and within 24 hours of any suspected violation of a child’s rights. Verbal reports are accepted, but must be put into writing within a day of the verbal report. If an individual is uncertain whether the situation or incident requires reporting they must consult with a school counselor, school administrator, or the school psychologist.

The ACS Child protection team and administration bear the duty to examine, evaluate, and inquire into any disclosures or reports of suspicion. It is not the responsibility of a reporter to carry out any additional inquiry. By enrolling children at ACS, parents and/or guardians understand that school administration will follow-up on any report of child protection violations. ACS will fully cooperate with any relevant authorities in any possible investigations of all reports of abuse or neglect.

Mandated reporters are entitled to immunity of any report of child abuse so long as the report has been made in good faith. There will be no retribution from ACS against any individual reporting or assisting with an inquiry of suspected child abuse. Any individuals engaged in retaliatory conduct against reporters or members of an inquiry team may be subject to disciplinary action.

## CONFIDENTIALITY

ACS will fully respect the privacy of those involved in all aspects of child protection cases. The identities of those involved in both reporting and any suspected incidents will be kept confidential to the greatest extent possible. However, disclosing identities to certain individuals or entities may be necessary for the purpose of both internal inquiry and mandatory reporting laws in the UAE. The school will report incident information to the extent necessary to maintain the safety of this and other communities.

All ACS employees are required to sign a code of conduct and confidentiality agreement that states they will maintain confidentiality and not discuss any student or family unless doing so in a professional situation and only with those individuals necessary to maintain the support and wellbeing of the student.

*These guidelines do not prevent anyone from sharing with a child protection liaison when something doesn't look right, sound right, or feel right.  
“If you see something, say something”*



## REACTING TO A DISCLOSURE

Please remember, teachers (or other employees/volunteers) are not investigators, it is not up to you to determine motivation for the disclosure or fact find, your role is to listen and remember when a student tells you sensitive information.

An ACS employee should:

- Listen carefully and remain objective.
- Do not 'swear' to secrecy or promise not to tell. You may need to report and preserving your trusting relationship with the student will be important.
- Stay calm and neutral as much as possible, expressing shock, disbelief, or disgust can affect a child's report and their emotional state.
- Slow Down. Respect pauses and don't interrupt the child.
- Do not lead the child to tell or gather unnecessary details
- If appropriate, respond by asking open-ended questions (**no leading questions!**) such as, "Who are you talking about?" or "When did this happen?"
- Questions such as "Do you want to tell me anything else?" or "What else can you remember?" allow for the student to reflect or clarify if necessary.
- Acknowledge the child's courage for telling you their story and assure them they are not to blame for what has happened.
- Do not promise that 'everything will be ok'.
- Explain to the child that you must tell someone else to get help. Try to let them know that someone else will need to talk to them to hear their story again. Empower the student by giving some choice, if possible - "Would you be more comfortable talking to the counselor or your principal?"
- Keep the information confidential from other staff or parents who are not directly involved in the case or on the Child Protection Team.

*\* If the child does not want to go home, this should be considered an emergency. Report immediately; do not take the child home with you.*

After the Disclosure:

- Write down or make notes as soon as possible after talking to the child. Record as many actual words/phrases the child used in their own voice as much as possible.
- Describe the child's observable behavior, do not interpret their demeanor. For example – *Student was pacing, talking quickly, their eyes were darting around the room, etc.*
- Indicate date, time, location of the disclosure, and names of those present for the conversation.
- Immediately follow the reporting pathway or report to your administrator, the child's counselor, or the school psychologist. (At maximum within 24 hours).

## REPORTING PROCEDURES

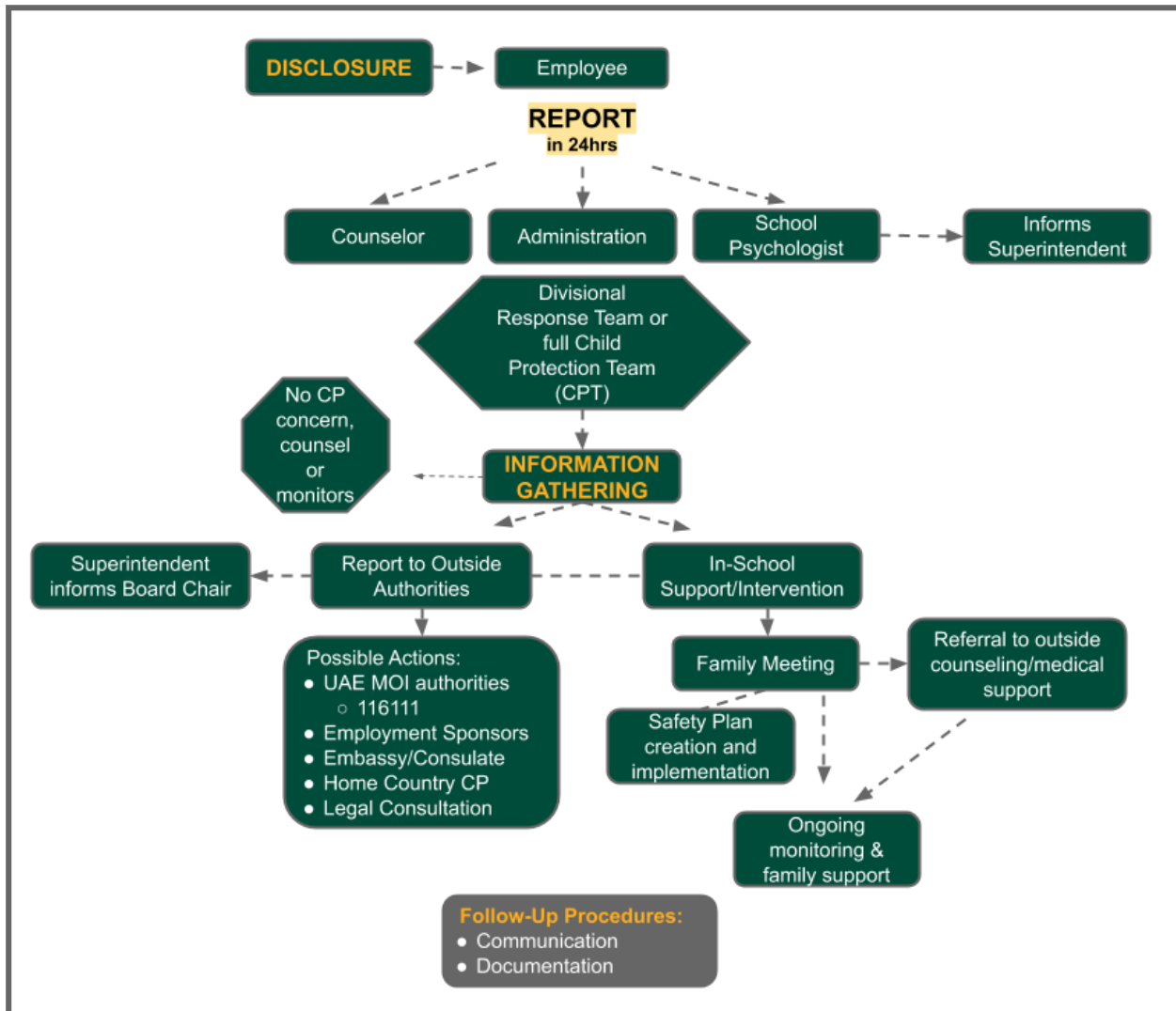
**Adults who see, hear about, know about, or have suspicion of possible child abuse (physical, sexual, emotional) or neglect or is at significant risk of being abused must make a report.** Reporting should occur as soon as possible and within 24 hours of any suspected violation of a child's rights. If a verbal report is given, it must be put into writing within 24 hours.

- Reports should be made directly to the child's administrator, counselor, or to the school psychologist. If the child's counselor or administrator are unavailable the report can be made to any division administrator. *In all cases the child's counselor and principal will be notified.*
  - If an individual is uncertain whether the situation or incident requires reporting they must consult with a school counselor, school administrator, or the school psychologist.
  - If a student is at risk for self-harm take that child immediately to their school counselor or the school psychologist.
- If any reporter has concerns regarding the conduct of a member of ACS administration (or counseling team), they should report their concern directly to the Superintendent or Associate Superintendent. The Core Child Protection team will be activated by the Superintendent.
- If the concern is regarding the Superintendent, the report goes directly to the Associate Superintendent who will immediately share with the Board Chair of the ACS Board of Trustees. Likewise, if the concern is regarding the Associate Superintendent, the report is made directly to the Superintendent who will immediately share with the Board Chair. The Core Child Protection team will be activated by the board chair and likely an external consultant will be contacted.

The Superintendent will be notified of any child protection case and can choose to convene the CPT to address the inquiry. If the CPT is convened and the case involves an ACS employee, the superintendent will chair the CPT and will notify the Chair of the ACS Board of Trustees. If the CPT is convened and the report does not involve an ACS employee the school psychologist will chair the CPT. If the case does not necessitate a full inquiry by the CPT, the division principal and counselor will have the support of the school psychologist to manage the case. Most cases of suspected abuse or neglect will fall under this last category requiring the smaller divisional response team. These cases are often short-term in nature (but may require consistent monitoring) such as:

- Student relationships with peers
- Parenting skills related to disciplining children at home
- Student-parent relationships
- Mental health issues such as depression, low self-esteem, grieving, concerns with suicidal ideation, psychosis, eating disorders, anxiety, etc.
- Contextual safeguarding concerns (physical spaces, supervision, transportation, communication, etc.)

## REPORTING FLOW CHART



Jennalee Murray, School Psychologist  
Lead Child Protection Officer  
jennamurray@acs.sch.ae; Ext. 754

### High School

- Amy Greene, HS Principal  
amygreene@acs.sch.ae; Ext. 832
- Christina McDade, HS Counselor  
christinamcdade@acs.sch.ae; Ext. 821
- Phil Abraham, HS Counselor  
philabraham@acs.sch.ae; Ext. 823
- Andy Wesier, HS Counselor  
andywesier@acs.sch.ae; Ext. 822
- Brian Cadogan, Secondary 8/9 Counselor  
briancadogan@acs.sch.ae; Ext. 835

### Middle School

- Karl Poulin, MS Principal  
karlpoulin@acs.sch.ae; Ext. 801
- Micheline Foss, MS Counselor  
michelinefoss@acs.sch.ae; Ext. 802

### Elementary School

- Heather Collins, ES Principal  
heathercollins@acs.sch.ae; Ext. 701
- Robin Gabriel, ES G2-5 Counselor  
robingabriel@acs.sch.ae; Ext. 703
- Stephanie Smith-Waterman, ES KG1-G1 Counselor  
stephaniesmith-waterman@acs.sch.ae; Ext. 740
- Farwa Devji, ES KG1-G1 Counselor  
farwadevji@acs.sch.ae; Ext. 756

## FOLLOWING A REPORT

*Keeping children safe and acting in their best interest takes precedence in all tasks.*

### Information Gathering

The divisional response team or full CPT will assign a member(s), usually the child's counselor, to gather additional information regarding the reported incident or disclosure. All follow-up inquiry will be conducted in a manner that ensures information is documented factually and strict confidentiality is maintained. Follow-up actions for information gathering may include:

- Interview the student
- Meet with any other students or employees directly involved or pertinent to the case including other professionals (school nurses, outside therapists, etc.)
- Review any history or previous incidents (including checking current safeguarding files for previous reports located with the school psychologist)
- Review any physical injuries or suspicions of intentional and unintentional injuries with the school nurses and document these injuries using body maps as appropriate.
- Gathering Contextual Information about the incident

*ACS reserves the right to confiscate any student or employee's computer as part of the inquiry process into possible child protection violations.*

### Action Steps

Based on the acquired information a plan of action will be developed to assist the child and family. These action steps may include:

- Family meeting or meetings with response team or members of the CPT
- Referrals to outside psychological/counseling support
- Referrals to outside medical professionals
- Safety Plan creation with student
- Ongoing monitoring and support for student and/or family
- Changes in physical spaces, increased supervision, intervention with peer groups, etc.

Cases that require continuous services and ongoing support may be referred to outside counselors or resources. Parents would be responsible for these services such as:

- Family counseling or parenting skill building in relation to disciplining children at home
- Student-Parent relationships requiring family counseling
- Mental health issues such as depression, suicidal ideation, eating disorders, psychosis, anxiety disorders, etc

*In cases of severe abuse, sexual abuse, and/or those cases being managed by the full CPT, reporting to outside authorities may be deemed necessary and may result in further inquiry and possible actions. Outside authorities could be defined as the Social Support Centre (branch of Abu Dhabi Police 999), UAE MOI child protection centre (116 111), employment sponsors, embassies/consulates, and/or the child protection entity in the home country of the family. Some cases may require a discussion with ACS legal counsel or consultation from an*

*external agency. The Superintendent may authorize police officers or other government officials to interview students with their counselor or administrator present in the role of student advocate. Whenever possible, parents will be notified by telephone of such interviews or actions. The Superintendent will inform the Board of Trustees as soon as possible when/if reporting to an outside authority is deemed necessary.*

### **Follow-Up Procedures**

The response team or CPT will manage communication with the reporting employee and others involved in any inquiry. The child's counselor will oversee any safety plans, communication with teachers, and ongoing contact with outside professionals or organizations working with the family or child.

All documentation (meeting minutes, emails, initial reports, etc.) of any inquiry and any action or safety plans will be kept in a confidential records file located with the school psychologist. In the case of a more severe and ongoing case, a more formal summary document will be created especially if the case requires outside reporting or consultation.

If the case involves an ACS employee, a final report will be kept in that employee's confidential file in Human Resources. If the employee leaves ACS, this document and/or its contents may be shared with any institution requesting employment information on that individual.

## **SCHOOL PERSONNEL**

*All ACS personnel are required to have criminal clearance before finalizing employment at the school and receiving sponsorship.*

The American Community School Abu Dhabi recognizes the importance of recruiting and retaining employees who have been vetted through a student safeguarding lens, who are committed to upholding safe practices, and who are willing to participate in additional training regarding the safety of children.

### **Safer Hiring Practices**

All employees, including external coaching staff, hired by ACS will undergo a thorough reference-checking process. The school shall require all employees to undergo:

- criminal five year history background check
- personal interview
  - including the question *“Have you ever been accused or involved in a child protection inquiry or investigation?”*
- confidential reference checks
- sign a code of conduct, confidentiality agreement, and technology responsible use policy and agreement
- participate in a child protection/safeguarding training(s)

### **School Staff Training**

All school staff will have access to these policies and procedures for reporting incidents involving student protection and safeguarding. Mandatory training for all staff will take place at the beginning of each school year. Additional training will take place, as needed.

## ENVIRONMENTAL SAFETY MEASURES

ACS does maintain an extensive CCTV camera system, implemented and maintained per ADEK regulations. The intent and purpose of the CCTV system is the preservation of life and to assist in the accusations of serious criminal activity.

Security personnel are on duty for all school-sponsored activities, both during school hours, and in the afternoon and evenings. The Health Office is open from 7:30-16:30; Nurses cover after school activities and other events as identified and requested by the Senior Leadership Team.

School access is controlled via locked gates and limited entrance options. Community members are required to use their badges to enter and exit ACS campus and visibly wear their badges while on campus. Lanyards are color coded to designate parents from employees. Visitors must register their ID with security and wear a visitor badge while on campus. *More information on visitors and volunteers can be found in the [Faculty Handbook](#).*

Students are supervised by ACS faculty or staff at all times, throughout the school day. Recess and lunch duties are shared by faculty and staff. Students are often greeted in the morning at school entrances, entrances and dismissals are supervised. After-school activities are supervised by adults.

School buildings, play equipment, and educational materials and apparatus are routinely assessed for security and safety purposes. ACS does not operate school buses for students.

## PARENT EXPECTATIONS

Student Safeguarding at school only happens with parent partnership. Parents are expected to support this policy and adhere to these guidelines as members of the ACS community. It is expected that parents keep all contact information, including emergency contacts on veracross up to date. It is also expected that at least one parent is present in the Abu Dhabi region with your child/children. If both parents must travel, please designate a caretaker for your child/children and inform your division office of that arrangement. This caretaker must be able to serve with full authority to make parental decisions to ensure appropriate supervision and respond to any emergencies.

## RELATED LINKS

[Code of Conduct & Confidentiality](#)

[Harassment Free Policy](#)

[ACS Emergency Procedures and Crisis](#)

[Response Manual](#).