



# Great Grace International School

## Employee Manual: Safeguarding Policy

### 2025- 2026 **Revision**

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#### INTRODUCTION

**“GGIS strives to provide a high-quality education in the English language equipping the student physically, spiritually, and academically, by teaching and demonstrating through a Biblical worldview.”**

GGIS is committed to safeguarding the health, safety, and well-being of every **child**<sup>1</sup> attending school and participating in its school programs. GGIS provides a safe and nurturing environment for children, protecting and safeguarding them to the highest standards possible. Safeguarding refers to measures that protect the health, well-being, and human rights of children, enabling them to live free from abuse. It is about people and organizations working together to prevent and reduce the risks, occurrences, and impact of harm. We believe that supportive nurture is always to be guided by biblical and school standards of morality, discipline, and respect. There is no intent, in any way, to usurp a parent's role as the primary caregiver and guardian of their children.

Our **Safeguarding Policy**<sup>2</sup> explicitly describes the policies and safeguards GGIS has adopted as part of its commitment to providing a safe environment where children can **grow physically, spiritually, and academically**.

**NOTE:** All employees and interns at GGIS are mandated reporters of child physical or sexual abuse under Hungarian law. You are not required or expected to investigate or take other action to confirm your suspicions.

#### GGIS' COMMITMENT

The safety of children is a top priority at GGIS. As a school, we rely on the commitment of all staff to promptly report any suspicious activity by staff or students, or hazardous conditions.

Our Safeguarding Policy serves to protect students from abuse or neglect. It empowers teachers and other adults with a 'safeguarding code' that will support them in maintaining healthy and positive student-developmental relationships with students.

To enhance our safeguarding policy, GGIS partnered with the Child Safety Protection Network (CSPN) in the summer of 2024. CSPN is a network of mission agencies, faith-based NGOs, and international Christian schools. Their mission is to collaborate with other Christian organizations to connect, educate, and protect through effective child safety programs.

<sup>1</sup> The common legal definition of a **child** is anyone under the age of 18. GGIS considers any student enrolled at GGIS to also be included in this definition and fall under the protection of these policies, even those who may be 18 or older.

<sup>2</sup> This policy has been developed in accordance with the principles established by a number of publications that inform best practice in safeguarding and child protection.



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As an educational institution, GGIS is committed to

- Developing Program Policies and Safeguards to protect students
- Encouraging and supporting families by training students and parents on the subject of safeguarding
- Empowering teachers by providing training on the subject of safeguarding
- Ensuring that all staff model safe and healthy interactions with students
- Screening all applicants for paid staff or internship roles in school programs
- Abiding by local law and complying with the legal requirements to report as necessary

### **SAFEGUARDING IS EVERYONE'S RESPONSIBILITY**

The staff must immediately report any suspicious activity, person, or circumstance to the School Director, or in the absence of the Director, the Managing Director.

*Remember, "If You See Something, Say Something." "If It Seems Suspicious, It Is Suspicious."*

Even if your role does not involve work or activity directly related to children, you should understand the importance of safeguarding. Everyone should safeguard and promote the welfare of children to reduce the need to protect them from harm.

Each staff member plays their part in helping to protect children by being aware of:

- Types of abuse and signs of abuse
- The procedures to raise a concern
- Who to communicate with when raising a concern
- General safeguarding procedures
- Safe working practices

### **SAFEGUARDING OR CHILD PROTECTION?**

The terms 'safeguarding' and 'child protection' are often used interchangeably, but they have different meanings, so it is important to note the difference.

The term **safeguarding** is what we do for ALL children and is linked to 'promoting welfare.'

**Safeguarding** can be defined as

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring children grow up in circumstances consistent with the provision of safe & effective care
- taking action to enable all children to have the best outcomes.



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**Child protection** refers to the action taken to prevent and respond to violence, exploitation, abuse, or maltreatment against children.

It is a school's responsibility to ensure it operates in a way that prevents and safeguards against the risk of maltreatment of children and young people.



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#### **SAFEGUARDING POLICY**

GGIS expects proper moral and ethical conduct toward all children in the care of GGIS, whether on GGIS property, under the care of GGIS staff, or attending a GGIS function. This expectation applies to all staff and interns working with GGIS. It also applies to any visitors. Staff and interns assume the responsibilities of setting and maintaining clear, appropriate boundaries in all interactions with children.

Although the legal definition of child abuse refers to actions against individuals under the age of 18, GGIS will also protect the rights and safety of all students regardless of their age.

#### **DEFINING CHILD MALTREATMENT**

Child maltreatment includes **any type of abuse or neglect** of a child or young person caused by inflicting harm or failing to prevent harm. Child maltreatment is a global concern because abuse can have a significant impact on a young person's mental and physical health, both short-term and long-term. The four commonly recognized forms of maltreatment are:

- neglect
- physical abuse
- sexual abuse
- emotional abuse

The way child maltreatment is described varies depending on the country. There are also other specific safeguarding issues that you should be aware of; for example, bullying (including online bullying), child exploitation, radicalization, domestic abuse, peer-on-peer abuse, and more.

Remember, abuse and neglect can happen anywhere; at home, in the street, at school, at college, or during private lessons. Children may be abused by an adult or adults, or another child or children, so being vigilant in the surroundings in which you work is important when supporting children and young people's welfare.

All child abuse can have serious and potentially devastating long-lasting effects. Some people mistakenly think that if abuse is not violent or sexual, it is not as bad. However, emotional abuse and neglect can be just as damaging, and because they can be difficult to identify, people are less likely to intervene.

#### **TYPES OF ABUSE**

##### **A. Neglect**

Neglect is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caregivers, and causes or has a high probability of causing harm to the child's health or physical, mental, moral, or social development. This includes the failure to properly supervise and protect children from harm.



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Children may occasionally disregard proper hygiene, minor medical attention, or even what some adults consider proper protection from the weather. These isolated examples are not considered neglect. Neglect is defined as the failure to care for or give the proper attention to something or someone.

#### B. Physical Abuse

Physical abuse is any act that results in a non-accidental physical injury. Inflicted physical injury could represent unreasonably severe corporal punishment or unjustified punishment. Physical abuse may also include, for example, slapping, punching, beating, kicking, biting, shaking, burning, holding underwater, pulling hair, or holding against one's will.

Although discipline should be instructive rather than punitive, occasionally, there could be a fine line between parental disciplinary practices and physical abuse. GGIS will not interfere with parental disciplinary matters **unless** an incident of abuse is clearly suspected or observed, or **unless** there is a pattern of abusive behavior on the part of one or both parents.

#### C. Sexual Abuse

Sexual abuse is the involvement of a child in any sexual activity. These are activities that he or she does not fully comprehend and is unable to give informed consent, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social mores of society. It is an activity between a child and an adult or another child who, by age or development, is in a relationship of responsibility, trust, or power. This may include, but is not limited to

1. **Verbal:** Remarks which include sexual threats, solicitation, innuendoes, comments about a person's body or appearance, inappropriate sexual talking, obscene phone calls, inappropriate text messaging or sending inappropriate images (sexting<sup>3</sup>), obscene or inappropriate sexual talking via the internet (social media<sup>4</sup>, e-mail, etc.), inappropriately affectionate comments, or any verbal expression with intent to arouse or stimulate.
2. **Visual:** Indecent exposure, showing or taking of suggestive pictures, peeping, leering, or staring. Visual sexual abuse also includes voyeurism<sup>5</sup>, exhibitionism<sup>6</sup>, the showing of pornographic material, or the showing of any human sexual activity or simulated sexual activity.

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<sup>3</sup> **Sexting:** the act of sending sexually explicit messages or photographs, primarily between mobile phones.

<sup>4</sup> **Social Media:** forms of electronic communication or internet sites through which users create online communities to share information, ideas, personal messages, and other content.

<sup>5</sup> **Voyeurism:** obtaining sexual gratification from seeing sex organs and sexual acts; one who habitually seeks sexual stimulation by visual means.

<sup>6</sup> **Exhibitionism:** a perversion marked by a tendency to indecent exposure.



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3. **Physical Touch:** Physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or, in the case of a female, breast; causing a child to perform or witness any of these acts. Any act in front of or to a child, such as rubbing, holding, or kissing, for the purpose of sexual gratification.

#### D. Emotional Abuse

Emotional abuse is defined as a pattern of inappropriate behavior over time<sup>7</sup>. It includes acts of omission and acts of commission.

- a. **Acts of Omission:** Emotional abuse includes the failure to provide a developmentally appropriate and supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with his or her individual potential and in the context of the society in which the child dwells.
- b. **Acts of Commission:** This includes acts toward the child that cause or have a high probability of causing harm to the child's health or mental, moral, or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust, or power. Such acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, humiliating, screaming, blaming, sarcasm, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.

## INAPPROPRIATE BEHAVIOR

#### A. Inappropriate Behavior By an Adult

GGIS will consider behaviors that do not meet the definition of abuse but do constitute behaviors that are harmful to children as "inappropriate behavior." An appropriate action plan will be implemented to provide accountability, mentoring, and counseling to overcome both the behavior and its causes.

At no time will a dating relationship be allowed between a student and a GGIS employee. Parental consent for a relationship that is commonly accepted and defined as inappropriate or abusive does not sanction that relationship, nor excuse any resulting behaviors and their consequences.

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<sup>7</sup> **Emotional abuse** implies a pattern of inappropriate behavior. There is a distinction between one-time inappropriate behavior which needs to be addressed to prevent recurrence, and repeated action, which could necessitate a report of suspected abuse.





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#### B. Child-to-Child Inappropriate Behavior

Should the victim of alleged abuse and the alleged offender be a child, it will typically be considered abuse only if there is more than a three-year age difference between the children. If there is less than a three-year age difference, what would normally be defined as abuse may be considered inappropriate behavior, with an action plan put in place to address the behaviors of concern and their effects.

The following factors will be considered in the response to child-to-child harmful behaviors: difference in age, responsibility, trust, power, development, awareness or understanding, coercion, and threats, whether implied or verbal. There is a difference between normal childhood sexual exploration and inappropriate sexual behavior or abuse. Typically, sexual abuse between individuals under the age of 18 is defined as any sexual behavior that occurs without consent or understanding by one party, without equality, or as a result of coercion.

In addition, the following actions may involve inappropriate behavior or abuse of one child to another and should be prohibited: bullying, hazing<sup>8</sup>, derogatory name-calling, ridicule, humiliation, or singling out a child for negative treatment or exclusion.

#### C. Local Legal and Cultural Factors

While it is recognized that local and/or national definitions of child abuse may vary, and there are racial, cultural, religious, and ethnic differences in child rearing and relating to children and understandings of what constitutes child abuse, it is important to remember that all children have basic human rights. Therefore, GGIS has utilized common basic definitions of abuse built on international standards. By adopting internationally accepted definitions by which all staff and interns will abide, adults of different cultures and cultural expectations will work together to prevent child abuse.

The question of how to handle “shame-based” rather than “guilt-based” cultural communication styles will be handled in the investigative stage by ensuring that cultural issues are addressed from the outset. Cultural representation during the investigative interview process is recommended.

The school director (and safeguard lead) is responsible for proactively investigating and knowing the civil and/or criminal laws that may apply to safeguarding and protection issues in the school’s host country.

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<sup>8</sup> **Hazing:** harassing, exacting humiliating tasks as a form of initiation into a group, or playing rough practical jokes upon another child



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#### PREVENTION STRATEGIES

##### SAFEGUARDING LEAD

GGIS will have a Safeguarding Lead whose job is to:

- Ensure Safeguarding policies and procedures are in place and are followed.
- Plan and implement relevant safeguarding training for staff and students.
- Maintain a clear reporting mechanism for raising concerns.
- Lead the response to any reports of harm to a child.

Students and staff can contact the safeguarding lead through [MyConcern](#) or in person at the school.

##### STAFF SCREENING & RECRUITMENT

All applicants for paid and internship staff roles at GGIS and its programs are subject to the screening process described below.

- A. Submit an employment application. The application contains questions regarding specific employment history and/or work with children.
- B. The Hiring Process Manager reviews all applicants' paperwork and follows up with applicants regarding any questions or clarification needed before presenting a candidate to a school administrator for a personal interview.
- C. All applicants identify three (3) references who complete a confidential reference form on the applicant. Reference forms are requested from a professional/employment-related reference, a pastoral reference, and a personal reference.
- D. The School Director conducts a personal interview with all applicants before offering a position. The director has the prerogative to ask specific questions about the applicant's interaction with children beyond what is provided on the application forms.
- E. The School Director recommends employee applicants to the Executive Team. The Executive Team reviews the files and casts a vote before the Managing Director and HR Office send a job offer letter to an applicant.
- F. The GGIS Human Resource Department requests a criminal background check on all new hires once the appropriate release form is completed. Individuals are not allowed to serve with GGIS until the background check is completed and verified as clear of any misconduct.
- G. The GGIS Human Resource Department is also responsible for obtaining a criminal background check on all national/local staff hired by the school.
- H. All official employees and volunteers must sign off on the [Code of Conduct](#)<sup>9</sup>.

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<sup>9</sup> The **Code of Conduct** is a document all employees and interns must sign.



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- I. All new employees must complete the TES<sup>10</sup> child protection for international schools module before starting their job on-site.

The School Director and the Managing Director will review applications and the results or findings of reference checks, interviews, and background checks. Applicants whose backgrounds reveal any of the following offenses are ineligible for a paid position or an internship at GGIS:

- Failure or refusal to complete the screening process
- Past history of physical or sexual abuse of children
- Past history of violence or conviction for a crime involving violence or the use of a weapon
- Conviction for any crime in which children were involved
- Prior termination from a paid or intern position due to misconduct with a child or violation of a safeguarding policy

The School Director and the Managing Director will re-evaluate paid and intern staff at GGIS no less than every two years. This review will include

- A discussion with the staff member's supervisor and possibly others about performance and behavior.
- Verification that the staff member has completed all required training for his or her position.

#### **SAFEGUARDING REQUIREMENTS**

The [Safeguarding Requirement Flowchart](#) details safeguarding requirements for staff, interns, workers, visitors, alumni, and parents. Staff, interns, and contracted workers with regular recurring responsibilities on campus wear name tags with blue lanyards so that staff and students can recognize who is approved to have direct oversight and responsibility for students.

Visitors, alumni, parents, and contracted workers must wear name tags with yellow lanyards. GGIS's Code of Conduct principles and photo guidelines are included on the back of the name tags. Wearers of tags with yellow lanyards must not have direct oversight and responsibility for students.

#### **SAFEGUARDING POLICY AND CODE OF CONDUCT**

Before commencing service at GGIS and every year thereafter, each staff member, intern, and contracted worker with regular recurring responsibilities on campus must read and agree to abide by the Safeguarding Policy and Code of Conduct and sign the [safeguarding acknowledgment form](#). The Code of Conduct is applicable to all children and at all times, whether during or outside of school hours. The HR department will keep records of all signed acknowledgment forms.

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<sup>10</sup> Tes Safeguarding, powered by EduCare, provides flexible, online courses, tailored for international schools



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#### AWARENESS & TRAINING

- All staff, interns, and contracted workers with recurring responsibilities must attend an annual safeguarding training either in person or online. The HR department will keep records of training attendance.
- All students will receive age-appropriate safeguarding instruction annually during the academic year. Parents will be informed of the content of the training.
- GGIS students and staff will know, through training, how to report a safeguarding concern.
- Families of GGIS students will have access to this policy. The Safeguarding Policy is on the school's website for public access.
- The Safeguarding Lead will provide safeguarding information or training for parents annually.

#### KEY ASPECTS OF THE TRAINING PROGRAM INCLUDE

1. Raising awareness and presenting data regarding the reality of and occurrence of child abuse in a school setting.
2. Recognizing the types of abuse, how abuse occurs, its behavioral and emotional indicators in children, as well as red flags identified for a potential offender.
3. GGIS's Code of Conduct for adults regarding interaction with children.
4. Identifying and preventing abuse between children.
5. GGIS policies & procedures for prevention of and response to abuse or neglect or suspicion of it.
6. Cultural factors in the home culture, organizational culture, host culture, and multicultural teams; Cultural and worldview issues unique to Hungary; Differences between acceptable behavior locally and acceptable behavior under GGIS Safeguarding policy.
7. Keeping a strict policy of staff members not being connected to students on social media. This includes Facebook, Instagram, Snapchat, Twitter, Tumblr, Line, and others. If students choose to follow a staff member on Instagram, Twitter, Snapchat, etc., staff members must refrain from private or direct messaging students. All staff-to-student interaction occurs over Jupiter, school email, or Google Classroom.

#### ONGOING TRAINING

The school director is responsible for ensuring that ongoing training occurs at the school. It will include:

1. Review of GGIS Safeguarding policies focusing on expected behavior with children
2. Safety measures
3. Reporting procedures
4. Emergency protocols
5. New tools and knowledge in the field of child safety



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#### TRAINING OF PARENTS AND STUDENTS IN CHILD SAFEGUARDING

GGIS will provide training and materials for parents to use in teaching their children about safeguarding. In addition, GGIS will develop and provide a direct training program for students in safeguarding. The school will teach a safeguarding curriculum/module to all students<sup>11</sup>. This training will include information on where to go for help related to inappropriate behavior, abuse, harassment, and bullying.

#### RECOGNIZING SYMPTOMS OF ABUSE OR NEGLECT

Adults should be alert to the physical signs of abuse or neglect, as well as to behavioral and verbal signs a victim might exhibit. A one-time event would not necessarily constitute a potential abuse case; however, sudden, unexplained physical or behavioral changes, particularly by children visiting other children in their homes, would warrant some investigation.

Remember, children regularly collect bumps and bruises during their everyday life, but it doesn't mean that they are being abused. All injuries need to be looked at in accordance with

- the age of the child
- their stage of development
- their social background
- where the injuries are on their body, and any explanation given.

You need to be observant and notice how the children and young people are, and if there are unexpected changes in their behavior. Consider whether what you are seeing or hearing is normal for them.

#### Physical signs may include

- Lacerations, bruises, burns, bites, and cuts
- Nightmares, stomach pains
- Irritation, pain, or injury to the genital area
- Difficulty with urination
- Discomfort when sitting or walking
- Torn or bloody underclothing
- Injuries that have not received medical attention
- Marks that might indicate a child has been restrained or strangled.

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<sup>11</sup> During Chapel for upper and lower school students.



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#### **Behavioral signs may include**

- Unexplained anxiety when approaching a specific location
- Nervous or hostile behavior toward adults
- Sexual self-consciousness
- “Acting out” sexual behavior
- Withdrawal from usual activities and friends
- Depression
- Self-destructive or aggressive behavior
- Difficulty in concentration
- Developing an eating disorder
- Refusal to discuss injuries
- Fear of returning home

#### **Verbal signs may include the following statements**

- “I don’t like (names a particular person)”
- “(Particular person) does things to me when we’re alone”
- “I don’t like to be alone with (particular person)”
- “(Particular person) fooled around with me”

#### **Emotional abuse signs may include**

- Self-harm marks
- Erratic weight or growth patterns
- Delayed development, either physically or emotionally
- Erratic behavior.

#### **Possible signs of child neglect may include**

- Low or non-attendance at school
- Frequent lateness
- Constantly hungry
- Poor personal and dental hygiene
- Inappropriate clothing
- Untreated medical problems
- Low self-esteem
- Poor social relationships



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- Compulsive stealing or scrounging
- Constant tiredness
- Lack of appropriate adult supervision which is likely to endanger the child.

#### **FURTHER PREVENTATIVE STRATEGIES**

- Guidelines for various programs (day trips, overnight trips, etc.) must be in place and implemented.
- Technology, such as internet filters and video surveillance systems, is used to further protect children.
- All staff have access to and must follow GGIS' Media Guidelines.
- Appropriate signage, such as signs restricting the use of restrooms to students
- Appropriate lighting
- Properly marked and maintained exits
- All classrooms and classroom doors have windows to provide visibility
- The Facilities Manager inspects classrooms, offices, and other areas to verify compliance with these safeguards.



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#### SAFEGUARDING CODE OF CONDUCT

Staff members and all those working with children through GGIS programs assume the full burden of maintaining safe, clearly established safeguards in all interactions with children. The safeguards established in this Code of Conduct are intended to do the following:

- Provide a safe environment for children.
- Ensure that adults model safe and healthy interactions with children.
- Protect those interacting with children from invalid reports of inappropriate behavior.

#### PRIMARY SAFEGUARDS

In any setting where children are present, at least one of these primary safeguards should be implemented, and as many as possible should be followed. These safeguards are applicable for in-person and online interactions.

##### Visibility

*"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 the window in the door, or keeping doors open.

##### Accountability

*"Do others know where I am or what I am doing?" "Am I promoting a culture of transparency and accountability?"* One-on-one interactions with a child, physically or online, should only occur in situations where other staff members are in the vicinity or when permission has been given by a supervisor or the parent. After-school tutoring on or off campus must have express permission from the school and parents.

##### Power Balance

*"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.

1. **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.





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- Hitting, slapping, or any behavior that assaults 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.

Adults should avoid favoring particular children to the exclusion of others or excluding children in a derogatory or embarrassing way in the presence of others.

2. **Touch** should be in response to the needs of the child and not the needs of the adult. Side hugs or loose hugs are generally appropriate. The following actions cause harm to a child and are to be avoided:

- Touching a child inappropriately.
- 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 can do themselves, including dressing and bathing.

3. **Communication** should always be wholesome and above reproach. The following communications, whether verbal, written, online, video, or photographic, cause harm to a child and are to be avoided:

- Shaming, belittling, humiliating, name-calling, or using harsh language that may frighten, threaten or humiliate a child.
- Language to infer favoritism or any secret communication with a child.
- Discriminatory remarks about the child, their family, and/or their place of origin.
- Inappropriate comments that relate to physique or body development.
- Sexually suggestive, manipulative, or exploitative comments, photos, images, or videos.

#### **SAFE WORKING PRACTICES**

By working with children, you are in a position of power and trust. For this reason, safe working practices must be adhered to at all times, as a duty of care to the children, yourself, and the staff around you. Children have a right to be safe and should be protected from all forms of abuse and neglect. You should be aware of and understand the school's Safeguarding Policy, the arrangements for managing allegations against staff, and the Staff's Code of Conduct.

The examples below outline some of the areas you should consider to help safeguard children and young people, but also help safeguard yourself.



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- Do not behave in a manner that could be deemed offensive to the people around you. For example, using foul or abusive language, arguments of a personal nature, being under the influence of alcohol, or being inappropriately dressed.
  - Unless you are warning a child about imminent danger, it is never appropriate to yell or shout at a child or another adult in the presence of children.
  - The use of profane words or gestures is strictly prohibited.
  - It is never appropriate to touch a child's body in an area normally covered by a bathing suit.
  - Should physical restraint become necessary for any reason, you must report the incident to the School Director or Lower School Director as soon as the immediate danger has passed.
- Do not offer rides. If necessary, because a child's parent has an emergency and is unable to pick them up from a program, you must follow the safe working practices outlined by GGIS.
  - Communicate with the parent about the situation and get instructions.
  - If you must transport a student, obtain permission from the parent to transport the child and provide details about the departure time and estimated arrival time.
  - Notify the School Director or Lower School Director of the need to transport a child, or be isolated with a child for any length of time, regardless of the reason.
- You should not be in personal communication with children or young people – including texting, messaging, or social networking sites.
  - It is never appropriate to invite a child under your care at GGIS to be your "friend" or "follow" you on a social media or social networking site. When invited to be the child's "friend" via social media, politely decline. Feel free to refer to the GGIS policy when declining such a request.
  - All digital communication with a child should come from Jupiter, the school's official communication channel, and when needed, Google Classroom or the school email.
  - All Cell phone communication (including texting or chat applications) is restricted to emergency cases only. For example, a student may be late to an off-campus program, and no other communication options are available or sufficient.
- Be open and honest; work in a way that cannot lead to anybody questioning your motivations or intentions.
  - When assisting a young child with toileting, never go into the bathroom with the child - leave the door to the bathroom ajar and wait outside.



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- When meeting with a teen, never do so alone and always do so in a public place, or the teen's home with at least one parent or guardian present in the home.
- You should not share any confidential or personal information about the children or young people except for professional use. The information should not be used as a source of gossip.

**Staff to Child Ratios:** A minimum of two staff members is required for all GGIS programs. In addition, the following ratios apply to extracurricular programs.

- For children five years of age: One staff member for every 12 children.
- For school-age children: One staff member for every 20 children.

In cases where GGIS cannot provide adequate staffing per the above ratios, a program must be canceled or discontinued.

**Photography:** Staff members are prohibited from taking photos of children and teens participating in GGIS programs for personal use, and strictly prohibited from posting photos depicting children and teens in GGIS programs on social networking sites, social media sites, or websites unless given express permission from the parent or guardian. This policy does not preclude a staff member from serving as a designated photographer for an event or outing. In those instances, all photos taken must be given to GGIS for review and use.

**Overnight Stays and Trips:** Never schedule or host overnight events in the residence of a paid or intern staff member. Staff members are strictly prohibited from inviting a child participant in a GGIS program to stay at their home under the auspices of a school-related function or activity.

- When escorting children on school-sponsored trips, a staff member may never share a hotel room with a single, unrelated child. When possible, parents may accompany their children on trips. If an adult must be present due to the age and maturity of the children, there should be a minimum of two children in the hotel room with the unrelated adult.
- All housing arrangements must be approved by the school administration. High school students who share hotel rooms or any shared accommodation with fewer than three students will require additional parental permission.

**Recordkeeping:** Effective record-keeping is key to our commitment to providing a safe environment. Records on students in GGIS programs are kept confidential, to the extent possible. The following items are collected and kept on file in GGIS offices or databases:

- Dated Participation Permission Forms - Every child under the age of eighteen (18) must have a dated participation permission form filled out and signed by his or her parent(s) or guardian(s) to attend or participate in any GGIS program offering supervision to minors.
- Event-Specific Forms – An event-specific permission form must be filled out and signed by the parent(s) or guardian(s) for their child(ren) under the age of eighteen (18) to be transported by



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GGIS to any other activity, program, or function than those agreed upon on the permission form.

- Attendance Record – Attendance is taken on regular school activities and trips. Attendance is not taken on after-school activities or events (i.e., Sports, Harvest Night, GGYG, etc.)
- Conduct Issues – All matters of significant conduct, including accidents, significant incidents, and matters of discipline beyond verbal correction, are recorded in Jupiter.

#### **BE VIGILANT**

Being vigilant is extremely important. Children can be at risk from others, but they can also put themselves at risk. You will see and overhear things that others may not notice. If you have concerns, then you must report them to the School Director or safeguarding lead for your school. If you have concerns about a child's well-being, the greatest danger is that you do nothing.

#### **Examples**

- You notice cuts or burns on a young person's arm, and the young person asks for first aid. Asking for first aid could be a cry for help because they need to talk to someone.
- You notice a child will not take their jacket off in hot weather, or they are wearing many layers of clothes. This may indicate self-harm, an eating disorder, or neglect.
- You hear a conversation of a sexual nature that is not age-appropriate. You become aware that the group has sent or received texts of an inappropriate nature. This is risky behavior.
- A child you have known for some time appears to be intimidated by a group of children at school. You notice they are quieter than normal. This may indicate the child is being bullied.
- You overhear a group of girls arranging to meet some older boys after school. When asked how they knew the boys, they said they had spoken to them on a social networking site but had never met them. This is risky behavior.



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#### **WHAT ABOUT EXPRESSIONS OF SUICIDE?**

Every expression of suicide, whether seemingly casual or serious, written or oral, with or without associated action, will be considered serious at GGIS. The school assumes the authority to act in the best interest of protecting the student while at GGIS, or a GGIS-related activity, but does not assume the full responsibility, authority, or liability of a parent.

#### **SUICIDE REPORTING PROCEDURES**

Staff members are required to report all expressions of suicide or actions associated with suicide. An oral report must be made immediately to the staff member's supervising director or school director.

The person reporting will immediately thereafter follow up with a written report on [MyConcern](#).

If the life of a student appears to be in imminent danger, the staff member or administrator will take immediate action to protect the life of the student. All staff members are authorized to take reasonable and prudent action.

The safeguarding leads (SL) will receive the written report logged in through [MyConcern](#). [The safeguarding team will discuss the report](#). The [safeguarding leads](#) will also contact the parents or guardians. If the substance of the report warrants it, the SL will see that steps are taken to

1. Protect the student beyond the immediate incident.
2. Seek professional guidance.
3. Refer the student for professional counseling in consultation with the parents.
4. Refer the incident to the parents for action.
5. Pursue further investigation as necessary.

The [safeguarding leads](#) will be responsible for ensuring that written records are kept of the action, including a written summary. Furthermore, they will also be responsible for ensuring that all records are kept confidential and shared only on a need-to-know basis.



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#### RESPONSE PROCEDURE GUIDELINES

These *guidelines* will help you determine to whom you should raise your concern. However, every situation is different, unique, and often multifaceted, and it may be difficult to ascertain who to speak to. Please contact [safeguarding@ggis.hu](mailto:safeguarding@ggis.hu) for any queries, or use this [link](#) to write a concern.

Low Level Concern	Medium Level Concern	High-Level Concern
<ul style="list-style-type: none"> <li>• Lying</li> <li>• Cheating</li> <li>• Personal misuse of technology</li> <li>• Inappropriate language</li> <li>• Disobedience</li> </ul>	<ul style="list-style-type: none"> <li>• Disrespect</li> <li>• Gossip/slander</li> <li>• Mocking/teasing</li> <li>• Serious or <b>repeated</b> behavior that violates school behavioral expectations.</li> <li>• Consensual sexual activity between peers* above sixteen</li> <li>• Bullying between peers*</li> <li>• Discrimination</li> <li>• Violent behavior that is not defined as physically abusive behavior</li> <li>• Possession of weapons</li> <li>• Gang activity</li> <li>• Possession or use of tobacco, alcohol, or drugs</li> <li>• Possession or pattern of viewing pornography</li> <li>• Depression, eating disorders, self-harm, suicidal expressions or indicators report directly to the Safeguarding Leads via <a href="#">MyConcern</a></li> </ul>	<ul style="list-style-type: none"> <li>• Abusive, harmful action towards a child (physical, sexual, emotional, neglect, or exploitation,) whether adult-to-child, child-to-child, contact or non-contact</li> <li>• Inappropriate behavior/relationships between adult and children</li> <li>• Harassment: aggressive pressure and intimidation, including sexual harassment</li> <li>• Threatening or bullying younger/weaker students, or a <b>pattern</b> of bullying behavior</li> <li>• Non-consensual, exploitative, or concerning sexual activity and anything below 16.</li> <li>• Distribution of pornography and any engagement in child pornography</li> <li>• Abusive or inappropriate social media or online communication between students, including nudes and sexting</li> </ul>
Behavior corrected and disciplined by the teacher, activity leader, or appropriate administrator/supervisor	<b>Repeated</b> and/or <b>serious</b> behavior that warrants discipline and/or counseling -- involves the appropriate administrators	This type of behavior initiates a response and the involvement of <a href="#">the Safeguarding Team &amp; School Director</a>
Reported to and resolved by a staff member/administrator. (reported under Jupiter, alert parents of all parties involved)	Reported to and resolved by an administrator, <a href="#">as needed</a> , the <a href="#">safeguarding team</a> is involved (recorded under Jupiter & <a href="#">MyConcern</a> , alert parents of all parties involved)	Reported to and resolved by the Safeguarding Lead/Team <a href="mailto:safeguarding@ggis.hu">safeguarding@ggis.hu</a>

\*A peer relationship exists when there is not a significant difference in responsibility, trust, power, age, development, awareness, and/or understanding between the individuals.



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#### **RAISING A CONCERN**

When harm 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 intern receiving the information must communicate the details accurately and completely within 24 hours to the Safeguarding Leads.

If you have concerns about a child or young person, doing nothing is not an option because you will not be fulfilling your duty of care. But it is not your responsibility to investigate; in fact, you must not investigate.

There must not be any attempt to handle the situation privately or enter into any private agreement with the person who reportedly caused the harm or the reporting person.

Any staff member or intern who has a concern or received a disclosure, or allegations, regardless of where it may have occurred, must **raise a concern** and alert the Safeguarding Leads using [MyConcern](#) reporting procedures, so they can act on the information you provide.

#### **RAISING A CONCERN RESPONSE PROCEDURE**

During the reporting and response process, procedure must be followed to protect the child(ren) harmed, the person who raised the concern, and the person(s) who reportedly caused the harm.

A child's report of abuse may be direct or indirect, or an adult may notice signs of abuse or neglect. When any adult in the community has reasonable suspicion<sup>12</sup>, observes, receives a report of child abuse, or has knowledge that gives reason to suspect child abuse or neglect, he or she has two responsibilities:

##### **1. Listen to the Child's Report and Provide Care and Support**

When a child reports abuse to any adult (disclosure), that adult's first and primary responsibility is to listen with compassion and care, without any attempt to evaluate the credibility of the report at this point. The following responses are important to convey to the child:

- *I'm very sorry about what happened.* Empathize with what they must be experiencing.
- *It's not your fault.* Children often don't believe you the first time, so you need to convey this several times.
- *You've done the right thing to tell. It was right and courageous to tell. You've done the right thing in sharing this.*
- *I will help you and support you.* Extend care and support in whatever ways possible for the victim and his/her family.

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<sup>12</sup> **Reasonable suspicion** is defined as being objectively reasonable for a person to entertain a suspicion, based on facts that could cause a reasonable person, drawing on his/her training and experience (when appropriate) to suspect child abuse or neglect.



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Listen to whatever information the child tells you without asking leading questions, asking the child for more details than they are comfortable sharing voluntarily, or trying to evaluate the credibility or the seriousness of the report. The compassion and care demonstrated by the first person to hear the child's report is one of the key determinants of the child recovering from whatever occurred.

At some point in this conversation, it is also important to communicate:

- The child cannot handle this alone
- That you take this seriously and will get the proper help to ensure that the child and others are safe

#### **Mistakes to avoid include:**

- Promising not to tell anyone. Often, children/teenagers will say, "I need to talk to you, but you've got to promise not to tell anyone." Making this kind of promise is not helpful to the child/teenager. Instead, we can say, "I can't make that kind of promise, since whatever is concerning you may take more help than I can give. However, I do care about you and want to listen well, support you, and do whatever I can to help."
- Forming conclusions about the truthfulness of the report.
- Minimizing the seriousness of the actions or dismissing them as not significant. What is traumatic varies from one individual to another.
- Handling it on your own. Abuse is a situation that can have a huge impact on the community and the organization as a whole.

## **2. Make the Initial Report to the Authorities**

Following the initial care given to the child, the adult's second duty is to inform the [safeguarding leads](#) immediately (or in cases involving the safeguarding leads, make the initial report to the Managing Director).

- The initial report should be made immediately without taking any other action or doing any preliminary investigation. This should be done, preferably, by in-person contact, but if that is not possible, use the [Raising a Concern Form](#) to include whatever was learned in writing as soon as possible so that it is remembered fully and accurately.
  - The **reporting duties are individual**, and no supervisor, administrator, or executive team member may impede or inhibit the reporting duties. No person making a report will be subject to any sanction by GGIS for making a reasonable report.
  - Reporting the information regarding a case of possible child abuse or neglect to





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another staff member, intern, or person other than the [safeguarding leads](#) (or the Managing Director, if the safeguarding leads are accused of abuse) breaks school procedure and will not be a substitute for making the mandated report to the safeguard lead.

- Upon receipt of a report, the Safeguarding Leads will form and facilitate a response team comprised [of at least two members of the safeguarding team](#) to complete an initial assessment. If the Safeguarding Leads are not available to lead the response, they will appoint [another safeguarding team member](#) to serve in their stead.
  - In cases where the [Safeguarding Leads](#), or a member of their family has reportedly harmed a child, the Managing Director will be notified and involved in the process. A responder from outside the school organization may be appointed to lead the response.

GGIS is committed to treating any information disclosed with discretion, and every effort will be made to protect the privacy of all parties involved. Parents will normally be informed if their child has been involved in a response. If the school believes that notifying the parents could increase the risk to the child or exacerbate the problem, advice may be sought first from relevant statutory authorities.

GGIS is committed to working with any relevant statutory authorities. In certain circumstances, GGIS is legally obliged to refer information to statutory authorities, and anything criminal will be reported.

The nature of a 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. Staff, interns, 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.

#### **GUIDING PRINCIPLES FOR THE RESPONSE PROCEDURE**

- All situations must be reported, regardless of the perceived severity or validity, including both those reports initiated by adults and those initiated by other children. It is often incorrectly assumed that incidents between same or similar-aged children can be handled between the families if the children are repentant and show no signs of being affected. If the children involved do not get appropriate counseling, there is a significant percentage of individuals who repeat the behavior with other children.
- There is no statute of limitations on internal investigations. Some legal systems make provision for a statute of limitations on investigating abuse incidents, allowing offenders to avoid prosecution if a certain amount of time has passed since the offense was committed. GGIS will, however, respond to reports of abuse, no matter how old, because of the importance to the victim, other children, and the school itself **(Historical reports)**.
- GGIS assists victims who are reluctant to report. Because of the danger offenders pose and the



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importance we place on the care and protection of the children entrusted to us, the school will take responsibility for investigating reports of child abuse, rather than expecting parents of children who are victims to pursue claims independently. When victims or their parents are reluctant due to fear of reprisal, lack of understanding of other potential victims, or lack of current symptoms, GGIS will seek to provide support, education, and care to them while moving forward with the reporting process.

- GGIS will become involved in any abuse accusation concerning a GGIS student, parent, employee, intern, or any other person with a direct connection to the school, whether or not the incident occurred on the property/facility of the school or was a school-sponsored event.

#### CONCLUDING REMARKS ABOUT THE RESPONSE PROCEDURE

These procedures are to be followed no matter how minor the incident is in the eyes of the individual receiving the information, and regardless of the ages of the individuals involved, including behavior that occurred between two children.

The safeguarding leads maintain the confidentiality of the reporter, the reported victim, and the alleged offender. No other members of the leadership team (or community members) who have no “need to know” are to be involved at this stage. It is presumed the parents of the victim are part of the “need to know” group unless they are themselves involved in the suspected abuse or pose a threat. The alleged offender is not to be advised of the report at this point.

Because abuse of children has such a huge impact on the lives of those involved, and others in the school community, GGIS recognizes the importance of a diligent and consistent response to reports.

#### **1. Provide Care and Protection for the Victim**

The safeguarding leads are responsible for ensuring that the child is safe. This involves ensuring the alleged offender has no further access to or contact with the child. It also may involve changing the environment to provide a renewed sense of safety.

#### **2. Get the Child Any Needed Medical Attention**

If sexual abuse involving intercourse is reported, it is important to seek immediate medical attention. There is only a small window of time during which medical staff may utilize rape protocols. Outside of emergency situations, the final decision concerning any medical treatment or counseling rests with the child’s parents.



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### 3. Reporting Allegations to Appropriate Authorities

It will be the responsibility of the safeguarding leads, in consultation with the managing director, to determine the appropriate reporting response under the statutes of the country or locality where the abuse allegation occurred. Once the appropriate reporting response is determined, any necessary action will take place in a timely manner. All GGIS personnel are expected to cooperate with local authorities fully in reporting allegations of abuse, investigations, and any resulting actions.

- **Cases occurring outside the United States when the offender returns to the United States**

If an individual identified as someone who has abused a child returns to the United States, it is GGIS's policy to report the incident to the appropriate authorities and jurisdictions in the United States.

#### **CLOSING THE RESPONSE**

After gathering all relevant and necessary information, a Statement of Findings will be submitted to the school director and other relevant administrators. This document will include recommended action plans as well as recommended organizational improvement plans for the school. All final decisions will be made by the School Director and Managing Director. A time to debrief and process review will also be conducted, with possible auditing from an outside agency. The Safeguarding Leads will ensure all action plans are followed.

The Safeguarding Lead/s will:

- Make any administrative discipline decisions
- Communicate final decisions to any relevant party
- Communicate with parents as necessary
- Make any Organizational Improvement Plan decision
- Keep all files in secure storage

The Response Protocol Manager will:

- Monitor all Child Safety Plans
- Monitor any Action Plans
- Assist the School Director/s with Final Communications
- Debrief with the Response Team and review and improve any process, including organizing possible auditing from an outside source.
- Submit any recommended Organizational Improvement Plan to the School Director/s and assist with implementation if needed.



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In every confirmed case of child abuse committed by a staff member or intern, the School Director will terminate their service with no possibility of reinstatement. The Safeguarding Lead will report these cases where applicable to the staff member's mission organization, certification agency, and any appropriate government agency in the staff member's passport country. Furthermore, the School Director may inform the school community.

If GGIS becomes aware that an abusive former staff member or adult intern is employed or volunteering at another school or organization and has access to children, GGIS will aim to inform that organization.

All paperwork related to the response will be stored in secure storage.

#### **Follow-up**

GGIS affirms that after-care must be provided to all members involved in any type of crisis or traumatic incident (such as an abuse case). This after-care should include a time of debriefing at a minimum. Often, additional counseling may be needed for those involved.

When a child has been abused, counseling for the child and the parents is a top priority. GGIS will work with the family to determine the best plan for the family to obtain counseling. GGIS has a responsibility to care for the victims of verified abuse and their families and reserves the right to require counseling to fulfill that responsibility.

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- You have reached the **END** of this document -



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#### SAFEGUARDING ACKNOWLEDGEMENT FORM

Before commencing service at Great Grace International School and every year thereafter, each staff member, intern, and contracted worker with regular recurring responsibilities on campus must read and agree to abide by the Safeguarding Policy and Code of Conduct, as well as sign the following Safeguarding acknowledgment:

- I have attended GGIS' annual safeguarding training.
- I have read, understood, and will abide by GGIS' Safeguarding Policy and Code of Conduct.
- I have not engaged in abusive actions towards a child, whether sexual, physical, emotional, exploitative, or neglectful.
- I have never been the subject of an investigation by statutory authorities.
- I understand GGIS takes concerns raised to safeguarding seriously and that harm towards a child, in any form, will not be tolerated. I understand that GGIS will cooperate with statutory authorities in the investigation of any report of abuse.
- I undertake to report any suspicion, concern, or disclosure of any child being at risk of harm, whether in school or outside of school, to the [Safeguarding Leads](#).
- I undertake to report any identification of a child engaging in self-harm or having suicidal thoughts to the school director and [Safeguarding Leads](#) as soon as possible.
- I will fully and truthfully cooperate in any response if concerns are raised.

**I have read this acknowledgment form and voluntarily signed it.**

Date:

Name & Signature:

Role with GGIS:

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The leadership team deeply appreciates the support and participation of all staff in the implementation of our Safeguarding Policy. If you have any questions about any of the information contained in this policy, please speak to your supervisor without delay.

**Submit this paper to the safeguarding coordinator (Lajos Kerekes)**

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