

MANAGING ALLEGATIONS OF CHILD ABUSE BY EDUCATORS AND OTHER ADULTS

Protocol for international schools

September 2018



International Task Force on Child Protection (ITFCP)

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[Council of British International Schools](#) (COBIS)

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We welcome opportunities to report our findings and discuss our recommendations.

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INTRODUCTION

This protocol provides a framework to guide school leaders and strengthen decision-making as they manage allegations of child abuse by educators and other adults currently or previously working in international school settings. Building on the work of the International Task Force on Child Protection (ITFCP) and the Safeguarding Unit at Farrer & Co, we continue our work across professions to develop child protection resources for the international school community.

We intend to enable schools to achieve the highest possible standards in child protection and safeguarding, which may exceed those set by local law.

This protocol is based upon:

- the diverse national and international contexts in which schools operate, and the requirements to conform to legislation in the country where the school is based, and possibly also to regulations issued by sponsoring organisations or governments and/or accreditation bodies;
- the responsibilities set out in the United Nations Convention on the Rights of the Child (UNCRC), which is central to the protection of children across the globe; and
- the ITFCP Statement of Commitment to Child Protection:

All children have equal rights to be protected from harm and abuse.

Everyone has a responsibility to support the protection of children.

All schools have a duty of care to children enrolled in the school and those who are affected by the operations of the school.

All actions on child protection are taken with consideration for the best interests of the child, which are paramount.



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PURPOSE AND RATIONALE

International schools face significant child protection risks. Mitigating those risks and keeping children safe can be difficult if a school feels isolated from local systems and support. To help schools globally, accreditation and inspection agencies around the world have set new standards for child protection, including:

- management, governance, and leadership of child protection;
- safer recruitment and vetting of all school staff and volunteers;
- procedures for reporting and managing concerns;
- a scheduled programme of regular, professional child protection training for all staff in accessible languages;
- a higher level of training for those leading internal investigations into any allegation against an adult;
- a child protection learning framework and curriculum, including healthy relationship education for students throughout their school experience; and
- systems to address peer-on-peer abuse and online safety.

This protocol touches on a number of these standards and deals primarily with procedures for reporting and managing concerns regarding adult behaviour. It recommends steps to take *before* an allegation arises, *when* an allegation arises, and *after* an allegation has been addressed. It also specifies critical points when your school should consult with external experts.

We have designed this protocol for international school communities regardless of geographic location, nationality, or ethnicity of the community served. When reviewing the advice presented in this document, consider your own school's legal framework, regulatory obligations, and unique cultural sensitivities.

Every allegation is unique. Although this protocol can generally be applied to all allegations of child abuse by educators and other adults, it may not be appropriate to carry out all the steps set out in this protocol or to carry them out in the order in which they have been described. Individual cases may need to be handled differently, and individual advice sought as needed.

Key terms

A full [glossary of terms](#) appears at the end of this document.

Allegation

An allegation is any concern that an adult working in a school has:

- a) harmed or abused a child, including physical, emotional, or sexual harm or abuse, exploitation, and neglect;
- b) behaved in a way that could constitute a criminal offence towards or related to a child; or
- c) behaved in a way that indicates they are not suitable to work with children.

Child

This protocol defines 'child' as any person aged under 18 or in receipt of educational services from the school.

A school's child protection responsibilities apply to all students, current and former, regardless of age. Although the starting point is the same regardless of how long ago the alleged abuse occurred or the age of the victim, a school's handling of an allegation may differ depending on these factors. For example, support services in the country where the school is based may only be available to those who are younger than the legal age of adulthood, and would not apply to former students who are now adults.

Victim

This protocol uses the term 'victim' to describe the child who has allegedly been abused. Not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Many, for example, prefer to be referred to as a 'survivor'. Schools should be conscious of this when managing any allegation and should be prepared to use any term that the victim is most comfortable with.



A note about defining abuse

Abuse is defined differently in different jurisdictions. This protocol draws on the following sources to define abuse:

- Article 19 of the United Nations Convention on the Rights of the Child (1989)
- The World Health Organisation
- The National Society for the Prevention of Cruelty to Children (NSPCC)
- The Australian Royal Commission into Institutional Responses to Child Sexual Abuse
- The Department for Education in England

Adult or staff

Unless otherwise stated, all references to ‘adult’, ‘staff’ or ‘member of staff’ should be interpreted as meaning owners, governors/trustees, all former and current teaching, residential, pastoral, support, occasional, supply and contract staff, leaders, volunteers, visitors, any other adults working in an international school setting on any basis, including contract, employment, and volunteer, and homestay providers.

Alleged perpetrator

This protocol uses the term ‘alleged perpetrator’ to describe the adult who has been accused of abusing a child.

External agency

Any reference to an ‘external agency’ should be interpreted as any entity who has delegated authority from the government or head of state in the country where the school is based, to investigate or respond to allegations of child abuse, or to whom the school has an obligation, duty, or expectation to report suspected abuse. These agencies may operate at a local, regional, or national level. External agencies and thresholds for reporting and investigating differ significantly across jurisdictions. Examples of external agencies are set out below.

Inquiry

The term ‘inquiry’ is used in this protocol to describe the process by which a school investigates an allegation so that, where possible, findings of fact can be reached. Although the term ‘investigation’ is also often used to describe this process, the term ‘inquiry’ is used in this protocol in order to make a clear distinction between (i) a school’s ‘inquiry’ (which can either be carried out internally or by an external expert appointed by the school), and (ii) any ‘investigation’ carried out by an external agency such as local law enforcement. The relationship between these two processes is set out in this protocol.

PREPARATION

Build your capacity

Safeguarding governance

- ✓ Appoint a member of your governing body/owner to take leadership responsibility for the school's safeguarding arrangements. Ensure that they receive safeguarding training and that safeguarding (including the management of allegations of abuse) is discussed at Board meetings.

A safeguarding risk register can help schools to identify, evaluate, and mitigate the different safeguarding risks that exist in their particular setting. Every school will share many of the same risks, but each will equally face risks specific to its community. Where a school has a safeguarding risk register, it should include risks relating to the management of allegations. There is no one template for registering risks that schools should follow; each school should approach this in a way that works best for them.

Safer recruitment

- ✓ Review your recruitment policy to ensure that your school has established effective practices and complies with applicable legal requirements.

Build your allegations management team

Allegations management team

- ✓ Create a multi-disciplinary allegations management team to help to ensure that the necessary preparatory steps are taken (as set out in this section), and to provide a source of expertise to be drawn on as appropriate by the person leading the school's response to an allegation.

Members of your allegations management team should possess a broad skillset, and should ideally include the following roles:

- the school's Designated Safeguarding Lead (DSL), also known as Child Protection Officer;
- the Head/Principal;
- a representative from your school's owner or governing body (for example, the Board chair; the governor with responsibility for child protection; the global or regional head of child protection within the school's group);
- a human resource professional;

- a legal adviser;
 - a communications professional; and
 - a representative from the local community to consider cultural and linguistic needs.
- ✓ Agree on the roles and responsibilities of each member of the allegations management team and document them.

If your school does not have sufficient internal expertise to form a full team, identify the most appropriate external experts for consultation. In smaller schools, overlap in roles and responsibilities may be necessary.

Response team leader

- ✓ Appoint one person from your allegations management team to lead your school's response to an allegation with clear, delegated authority, and one person to lead in their absence, or where there is conflict of interest (for example, where the alleged perpetrator is a close friend of the response team leader).

The response team leader should be in a school leadership role and trained in child protection. To ensure independence and objectivity when reviewing allegations, the response team leader should be accountable to other senior leaders in the school, such as the Chair of the Board of Governors. Please see the response section below for further details of the role of the response team leader.

Build your policies and procedures

All policies should be available in the languages of instruction and the languages of the local community to ensure transparency and accessibility. Tailor your policies to your school community, considering the law and external reporting obligations, cultural sensitivities, and local agency responses. Ensure broad consultation within the school and local community as the policies are designed to ensure all stakeholders in the school community, including parents and students, have read, understand, and can follow the policies, which may exceed local laws and cultural expectations. Examples of school policies and action plans appear in the [resources](#) section of this document.

Managing allegations policy

- ✓ Design and publish a policy establishing your school's procedures for managing allegations of child abuse by educators and other adults.

This policy, which can either be part of the overarching child protection policy or a standalone policy (in which case the two policies should cross-reference each other), guides your staff and school community about reporting concerns or allegations of abuse. Any processes should be outlined to promote transparency and protect confidentiality to the extent possible, for those involved.

Include in this policy:

- your school's broad principles on ethical, legal, management, and communications aspects of child protection;
- how allegations and concerns should be reported and to whom (ordinarily this will be the Head/Principal and/or DSL);
- specific steps that your school will follow when responding to allegations of abuse (both current and non-recent) – the steps should be broad enough to accommodate different fact patterns and allegations;
- steps that the school will take to protect the privacy rights of the child or children who has allegedly been abused, and of the alleged perpetrator (for example, by only sharing information about the allegation on a 'need to know' basis);
- the process for documenting allegations and recording decisions taken;
- the criteria and process for informing external agencies;
- what decisions should only be taken following an external agency's decision as to how to proceed;
- what action your school will take when external agencies are not able or willing to intervene, and/or where the behaviour does not meet the threshold for referral to external agencies; and
- factors your school will consider in relation to the alleged perpetrator, including:
 - when to inform the alleged perpetrator of the allegation and the process the school will follow to address it;
 - how to uphold the alleged perpetrator's employment and privacy rights and follow the principles of natural justice, which include advising the alleged perpetrator of the allegation and an opportunity to respond to it;
 - determining if and when the alleged perpetrator will be relieved from duty and if it will be paid or unpaid;
 - determining other appropriate interim remedies; and
 - support to be provided, such as counselling.

Allegations action plan

- ✓ Design an allegations action plan for use by your allegations management team, which sets out the factors your school would consider following an allegation of abuse against an adult working in your school, including the financial resources available to the school in the event of an allegation, and how these can be accessed quickly once an allegation arises.

When responding to an allegation, school leaders will be able to maintain their focus by having a clear plan which they can follow together across different disciplines, such as finance, security, IT, communications, and legal. The plan needs to be sufficiently flexible for use by the management team in unpredictable scenarios.



Strengthening your school's response to all concerns, no matter how small

Although this protocol is aimed at guiding schools when responding to a concern that meets the threshold of an allegation, schools should ensure that they respond to all concerns about adults' behaviour towards or around children robustly, no matter how small the concern is. Examples of concerns that may not, depending on the context, meet the threshold of an allegation, include:

- ignoring or disregarding guidance on safe practices (refer to staff behaviour code);
- a sense of unease as to the individual's behaviour around children (including grooming behaviour – see the [glossary](#));
- lack of understanding or recognition of the need for clear personal and professional boundaries (refer to the staff behaviour code);
- exploiting or abusing a position of power or authority;
- acting irresponsibly or questionably, which any reasonable person would find alarming or questionable given the nature of the work;
- demonstrating a failure to understand or appreciate how questionable actions could adversely impact the safety and well-being of a child; or
- exercising poor judgement with respect to standard policy and procedure.

Each concern should be dealt with on a case-by-case basis in accordance with relevant policies. Where the concern involves a breach of the school's policies or staff code of conduct, that breach should be dealt with robustly and may require formal disciplinary action. Consider any previous concerns that have been raised about the adult and the wider context in which the concern arose. Be mindful that a series of concerns may meet the threshold of an allegation, and that the development of a pattern is often critical and may indicate grooming behaviour. Addressing such concerns is part of creating a culture in which values, professional boundaries, and expected behaviours are clearly understood, followed, continually monitored, and reinforced by all adults working with children. If implemented correctly, such practices:

- ensure that adults working in the school are clear about professional boundaries and act within these boundaries, aligned with the ethos and values of the school;
- encourage a more open and transparent culture, where staff and students feel comfortable sharing concerns; and
- enable schools to identify concerning behaviour early.

Staff code of conduct

- ✓ Design or review a code of conduct that applies to all adults working in or visiting your school.

Specify expectations for behaviour. Translate the code into the local language to strengthen understanding and require all adults, including visitors, volunteers, and parents to review, discuss, and sign off on this code of conduct.

Be explicit about what is unacceptable behaviour with children and provide guidance about what is positive behaviour toward children. The code should include:

- your school's rules on contact with children outside of school, such as via social media or in the context of private tutoring, babysitting, trips, and extra-curricular activities;
- the disciplinary action and dismissal procedures resulting from any breach of the code; and
- references to your school's disciplinary procedures, IT policies, and guidance on health, safety, and cultural sensitivities.

Data protection and information sharing policy

- ✓ Put in place or renew an existing data protection and information sharing policy that deals with the recording, storing, and use of safeguarding data. This should include data relating to allegations of abuse.

This policy should comply with data protection laws in your country to protect the well-being of the child, both within the school (such as during a change in leadership), and with external agencies. In the case of a child transferring to another school or university, the policy for sharing the file should be clearly documented and understood.

Educate your community

- ✓ Deliver regular training and education in the relevant languages to your school community (including students, staff, and parents) on the prevention, identification, and reporting of abuse.
 - Train members of your school's allegations management team on handling allegations of child abuse by educators and other adults. Consider arranging for a member of your managing allegations team to receive specialist training on carrying out inquiries into allegations of child abuse, which would be helpful in cases where your school cannot commission an external expert (see below for further information on inquiries).
 - Ensure the curriculum delivers comprehensive and age-appropriate learning for all children at the school, including what is acceptable behaviour by adults, and how to report concerns to a trusted adult. Listen to, consult with, and engage with students when designing and delivering the curriculum. What children tell us is critical; it is not just about educating them but also about learning from them.
 - Train members of your staff on safe and appropriate behaviours; how to identify institutional grooming and abuse; how to receive and respond to disclosures of abuse; on cultural issues relevant to child protection; and on how to have sensitive or difficult conversations about child protection with parents and students across cultures. Ensure that all staff understand their professional and legal obligations to



The hidden reality of abuse

The signs of child abuse are not obvious, and a child often does not tell anyone what is happening to them. Although the prevalence and extent of abusive behaviour remains hidden, some studies suggest that as many as 1 in 3 girls and 1 in 4 boys are sexually abused, and that only about 5% of children who are sexually abused report it.

(McGee, Garavan, De Barra, Byrne, Conroy, 2002)

identify and report abuse, barriers to disclosure (including language), and guidelines for responding to a child's disclosure. All adults working with children should be alert to potential signs of abuse and neglect. Emphasise positive behaviours and unsafe behaviours for all adults working in your school.



It is a common myth that local child protection laws do not apply to international schools.

International schools are subject to the laws of the country where they are based. This includes any legal obligation to refer allegations of abuse to external agencies.

Mapping exercise

- ✓ Conduct an initial mapping exercise to identify the following:
 - the external agencies to whom the school should report allegations of child abuse by educators and other adults, and who the school can draw on for support;
 - key local, national, and international entities, organisations, and individuals that can be drawn on in the event of an allegation of abuse; and
 - medical support and expertise available.

Engage members of the allegations management team in this exercise and keep your map under regular review.

Identify relevant legal expertise and understand local laws

- ✓ Identify and build a relationship with a reputable local law firm which understands and is experienced in child protection and managing allegations of child abuse by adults, ideally within educational institutions.

Where a local law firm with the relevant expertise cannot be located within the jurisdiction where the school is based, identify (i) a law firm based in your jurisdiction with expertise advising schools, and work with them to develop their expertise and understanding in child protection; and (ii) a law firm based outside your jurisdiction with expertise in child protection and managing allegations of abuse by adults in international settings, ideally within educational institutions, which can be drawn on when faced with an allegation.

- ✓ Research local laws for reporting alleged child abuse, and how they are implemented and handled in practice.

With assistance from a local law firm and/or external agency:

- answer questions such as: Which external agencies does your school need to inform if they suspect that a child is being abused? Does this differ when the alleged perpetrator is a member of staff, as opposed to a parent, guardian, or other adult? How will the agencies respond to an allegation of abuse? Will this differ according to certain factors such as the nature of the alleged abuse (for example, whether it is sexual or physical), the age of the victim, risk of re-victimisation;
- ensure you understand how criminal law relates to offences concerning sexual behaviours between adults and the children they teach or care for – including the age of consent, the breach of positions of trust, and any statute of limitations on criminal cases of child sexual

abuse. Meet and confer with local police to learn which allegations are criminal in nature and whether the local or international police have the authority to investigate. It is important to note that any member of a response team tasked with deciding if or when law enforcement should be notified, should always err on the side of caution and consult with police as to whether or not the allegations are criminal in nature and whether or not police have authority to investigate; and

- confirm the local employment law on the suspension and dismissal of staff.

Understand your cultural context

- ✓ Organise group discussions with key stakeholders addressing attitudes on relationships and abuse.

Consider including parents, students, faith leaders, sports coaches, or governmental officials. Identify under-represented groups to determine varying perspectives. Consider the cultural sensitivities of your school community and significant differences across cultures which affect how an allegation of abuse may be perceived and addressed. While schools should seek to safeguard children in ways that are culturally sensitive and appropriate to the context, 'culture' should never be used as a reason or excuse to abuse children. Ensure all documentation is translated accurately into the local language and further adapted as needed.

Insurance

- ✓ Familiarise yourself with relevant insurance policies, including those for third-party contractors, companies, and individuals.

Consider contracting an independent insurance specialist to review your school's insurance policies, including:

- the types of claims covered and conditions for filing;
- the time period covered;
- any gaps in coverage; and
- the insurer's international reputation and experience in handling abuse claims.



Working with external agencies

External agencies may include:

- the police or other law enforcement agencies;
- governmental departments (for example, department of children and families, health, or education);
- national educational licensing/certification boards or agencies and national records bureaus;
- child protection agencies such as social services, children's social care, or equivalent;
- relevant regulatory bodies governing, for example, schools, charities, and/or businesses;
- insurers;
- inspection and/or accreditation agencies;
- appropriate diplomatic mission, consulate, or embassy, including embassy liaison officers (for example, in cases where the child holds diplomatic status, other police or social resources may be available or required); and
- family or children's courts or tribunals.

This list is not exhaustive but is provided by way of illustration.

Identify and build relationships with external agencies and other experts

Do not operate alone. Before any allegation occurs, build relationships with all relevant external agencies and any other organisations or experts who may be able to assist the school in managing an allegation of abuse, by identifying the appropriate individuals or teams within each agency that can help.

These relationships help not only when managing an allegation of abuse, but also when carrying out wider child protection and prevention work. Consider the scope of external expertise that may be required, including the necessary financial commitments and verify the level of school resources available and the way in which these can be accessed easily once an allegation occurs. Keep in mind that external agencies may have readily accessible resources.

- ✓ Identify external agencies in your community and meet with them, find out how they work, obtain contact details, and stay in touch with them.
 - Ask them about the thresholds for reporting and the information they need at the time of reporting/referral.
 - Obtain agency referral forms and discuss how they will respond when an allegation comes to light.
 - Invite agencies into your school to inform and educate the community.
 - Find ways of connecting with recommended experts or peer educators who have experience managing cases of abuse in schools.

Medical expertise

- ✓ Determine local legal requirements for sexual assault exams, and appropriate medical facilities for children.

Identify and visit facilities in advance and speak with staff to understand their experience and expertise, what resources are available, and the eligibility of international students and families. The World Health Organization's clinical standards may be useful to determine the competence of medical facilities (found in the [resources](#) section). Examples of facilities include:

- health clinics and hospitals;
- forensic medical facilities;
- mental health organisations;
- victim service agencies/organisations (such as rape crisis and domestic abuse agencies, or anti-trafficking organisations); and
- services available to traumatised children.



Your action plan

- ✓ Develop a managing allegations policy, allegations action plan, and staff code of conduct.
- ✓ Communicate these clearly with your staff and community in relevant languages.
- ✓ Deliver regular training to your staff, students, and school community.
- ✓ Identify strategies to create an environment that allows students to report abuse.
- ✓ Conduct a mapping exercise to identify which individuals and organisations should be involved or could be useful when managing an allegation of abuse.
- ✓ Establish relationships with external agencies that can provide support and expertise.
- ✓ Research local laws and your insurance coverage.

GUIDING PRINCIPLES

Effective management of an allegation is guided by three duties:

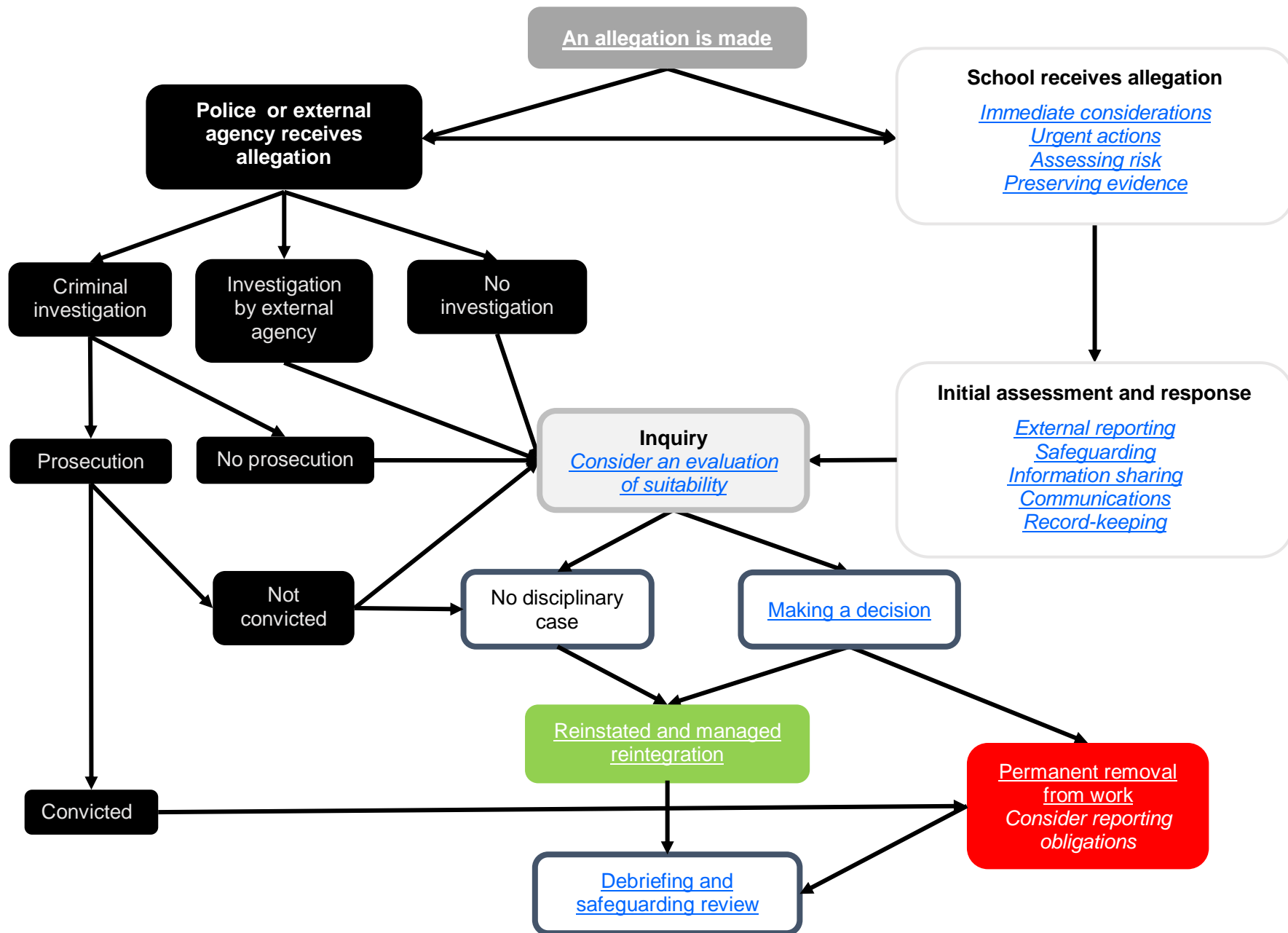
- 1. The duty to children:** to keep children safe and act in the best interests of victims and children in your school or elsewhere. This takes precedence over all other duties and includes providing support for all children affected; ensuring the continuity of education and delivery of services to children; ensuring that the best interests of the victim are the primary consideration in decision-making; where possible, taking into account the victim's wishes and feelings when making decisions, while recognising that the ultimate decision lies with adults; working with the parents unless to do so would jeopardise the welfare of a child; and working across agency and institutional boundaries to protect children.
- 2. The duty to the alleged perpetrator:** ensuring that their rights are upheld (including their employment and privacy rights) and that the principles of natural justice are followed. These principles require schools to provide alleged perpetrators with notice of the allegation and an opportunity to respond.
- 3. The duty to the law and mandatory reporting obligations:** ensuring that local and international legal obligations are complied with; allegations are reported promptly to relevant external agencies; and that the school's immediate actions protect as far as possible the integrity of any future criminal investigation.

Basing decisions on these three duties and clearly communicating your actions to stakeholders will help to protect the reputation of your school. At times, these three duties may appear to be in conflict with each other as you consider your local context and the likely response. Decisions should take account of all three duties and seek ways to meet these safely, but the welfare of the victim and other children should always be the primary consideration.

RESPONDING TO AN ALLEGATION

Effective management of an allegation relies on expertise and clear judgment. Seeking advice from experts with experience managing allegations of child abuse by educators and adults in school communities can help you to make decisions effectively at each step.

The [map](#) on the next page illustrates the process for an effective response to an allegation of abuse. Consult with experts and seek guidance as you consider each step. You can see that the school and law enforcement processes run parallel to one another and connect at certain points. It is important that an inquiry undertaken by the school does not conflict with any criminal investigation led by any external agency such as the police. Police should be consulted at the earliest possible moment. Police will advise what activities can be undertaken by the school while a criminal investigation is being considered or conducted. Gathering evidence and admissibility are key elements that the police will want to protect.



An allegation is made

An allegation may come to light in a number of ways, including:

- a written statement from the victim or another member of the school community (including students, alumni, current and former staff, or parents), that describes or implies inappropriate behaviour by an adult – these can come to light in a number of ways, including in correspondence with the school or others, in responses to alumni questionnaires, and in general statements posted on social media;
- a verbal or non-verbal (such as through play) disclosure or partial disclosure from the victim or another member of the school community (including students, alumni, current and former staff, or parents);
- the monitoring of staff and student information services or social media use;
- from a member of the public, police, health, or another external agency informing the school; or
- a legal claim.

School leaders should always respond to an allegation, no matter how ‘well respected’ or senior the alleged perpetrator, or how ‘challenging’ or ‘troublesome’ the victim may be perceived to be. Deliberately invented or malicious allegations are extremely rare. Anonymous allegations and allegations that are seen as ‘malicious’ should be examined carefully and never dismissed based on anonymity or perceived motivation of the referrer.

Immediate considerations

Reacting to a disclosure

- ✓ Where a child discloses that they or another child is being or has been abused or harmed, adopt a trauma-informed approach.

If the child is not forthcoming, ask if they would like to speak to another adult with whom they may feel more comfortable, such as a school counsellor. Ask open-ended, non-leading questions to facilitate disclosure, determine the well-being of the individual and provide support.

Questioning should be limited to critical information in order to:

- understand the basic facts (*Where and when did the incident take place? Which adult was involved?*);
- determine the immediate safety of the child (*Will the child encounter the alleged perpetrator within the next hour?*); and
- determine if the child needs immediate psychological or physical medical attention.

In the case of a written disclosure of non-recent abuse, the response should be prompt and personal, avoiding a legal tone.



A **trauma-informed approach** is a counselling method that:

- realises widespread impact of trauma;
- understands potential paths for recovery;
- recognises the signs and symptoms of trauma in clients, families, staff, and others;
- responds by fully integrating knowledge about trauma into policies, procedures, and practices; and
- actively works to prevent re-traumatisation.

DO:

- stay calm and show no signs of shock;
- listen and respond with empathy in a non-judgmental and open way;
- consider the disclosure seriously;
- remain calm, supportive, and reassuring;
- validate the child's feelings;
- explain what you need to do (report to the DSL) and why;
- allow the child control when feasible;
- consider the child's language needs and whether support in another language is necessary;
- reassure the child that they have done the right thing in coming forward; and
- take notes and make a record as soon as possible following the disclosure.

DO NOT:

- view images of children (rather ask for a brief description and secure a device as possible evidence for law enforcement);
- interview the child, ask leading or unnecessary questions, or provide language for the child;
- take notes during the disclosure;
- make promises that may not be able to be honoured (such as promising you won't tell anyone or that this will never happen again);
- suggest that the child may be to blame in any way for what happened; or
- ask the child to wait until another person can be present to witness the disclosure.

Urgent actions

- ✓ Take any urgent actions needed to protect the child from imminent risk of harm. This may include emergency services to undertake a medical examination. (Be mindful of cultural sensitivities.)
- ✓ Report the allegation immediately to the person named in your managing allegations policy. If your school does not have a policy, the allegation should be reported to the Head/Principal.
- ✓ Record the allegation as soon as possible.

Any member of staff who becomes aware of an allegation should make a record as soon as possible including:

- time, day of the week, date, and location of the disclosure/discovery;
- identity of child and alleged perpetrator;
- details of the demeanour and behaviour;
- who it was reported to; and
- the name of the person making the report.

When documenting a child's disclosure, record the statement using the child's own words as soon as possible following the disclosure. Sign and date the record. Any additions or changes should be added to the initial record without altering the original.

- ✓ Consider, in consultation with legal advisers where necessary, whether any external agencies need to be informed (see [external reporting](#)).
- ✓ Consider seeking early legal advice from a law firm with experience handling child abuse cases before taking any further steps.

Seeking early legal advice will help you to understand and comply with mandatory reporting obligations and other legal obligations, such as those pertaining to the rights of the alleged perpetrator. It will also help to ensure that you do not jeopardise future investigations, and/or breach the alleged perpetrator's legal rights. As set out above, your legal advisers should have knowledge and experience of handling child abuse allegations and the relevant law of the country where your school is based. Where it is not possible to identify a specialist local law firm, you may need to confer with an international law firm that has expertise in handling child abuse allegations, in addition to a local law firm that has expertise in local law.

- ✓ Decide who will lead the school's response to the allegation (the 'response team leader').



Urgent questions to ask

Is the child safe? Is the child traumatised, experiencing pain or could they be injured?

Seek medical attention promptly. Speak with a nurse or call an ambulance, as indicated in your action plan.

Has sexual assault/abuse occurred (or suspected to have occurred) within the past 72 hours?

A sexual assault examination may be necessary. Discuss this with law enforcement, a school nurse, and with the child and their family. The nurse may be able to advise on the best medical facility to use and accompany the child and family to act as an advocate.

Is there concern that the child may be suicidal or psychotic?

Inform your school counsellor immediately and seek prompt psychiatric evaluation.

Although the response team leader will ordinarily be the individual appointed by the allegations management team, in some cases it may not be (for example, where the appointed individual is unavailable or there is a conflict of interest). The response team leader should form a small response team made up of key individuals who are needed to help to coordinate the school's response. The nature and size of the response team will depend on a number of factors including the nature of the allegation. In forming this team, the response team leader should (i) draw on the expertise that exists within the allegations management team, ensuring where possible that the response team includes individuals with expertise in safeguarding, communications and human resources; and (ii) not make the response team any bigger than necessary, so that information about the allegation is not shared too widely. The role of the response team is not to investigate the allegation. It is to coordinate the school's response to the allegation.

Assessing risk and preserving evidence

In consultation with your legal advisers and any external agencies, assess immediate risk and preserve evidence. Consider appointing one member of your response team to lead necessary consultations with external agencies and put in place an interim risk assessment protecting children from further potential harm by the alleged perpetrator until they can be informed of the allegation.

Any steps taken to preserve evidence should, where possible, be taken in consultation with your legal advisers and any external agencies. It may be necessary to involve the IT manager from an early stage to ensure the preservation of evidence. For example, this could involve removing the alleged perpetrator's access to school systems prior to notifying them of the allegation or preserving the alleged perpetrator's email and other digital accounts prior to restricting access.

Once access is restricted, offline systems and devices should not be investigated by IT personnel. It may also be necessary to secure personal school-provided devices (such as those of the alleged perpetrator and/or victim), but do not attempt to search or view images. Any devices that are secured should be shut down completely and immediately placed in a secure area. To prevent material from being deleted from the device after being secured (for example, via the cloud), devices can be placed in a lead-lined safe or, where one is not available, wrapped in aluminium foil. Provide the evidence to any external agency or to the person conducting an inquiry.



Assessing risk and preserving evidence

- Did the alleged abuse occur on school property?
- Is the alleged perpetrator in a position of trust? What is their role in the community?
- When will the alleged perpetrator next encounter children (including their own), and will they be alone with the children? Is there a possibility that the alleged perpetrator will be alone with a child in an isolated area or in a room without windows?
- Can contact with children be cancelled without tipping off the alleged perpetrator? If not, what measures can be put in place to increase supervision and minimise any one-to-one contact until the alleged perpetrator can be informed?
- Was abuse carried out on school devices? What immediate steps should be taken to secure those devices?
- Can the school's IT manager shut down the alleged perpetrator's access to the school's system without raising suspicions?
- Does the alleged perpetrator have any children at the school or a spouse working at the school? How should this be managed going forwards?
- Does the alleged perpetrator have access to children at home or in their community?

Initial assessment and response

External reporting

Your school should always consider, in consultation with its legal advisers, whether there is a need to report to and engage external agencies. Proactive reporting and transparency can lead to additional support and may protect the integrity of a criminal investigation related to evidence gathering and admissibility. There may also be a legal requirement on the school to make a report. In borderline cases your school should always err on the side of caution and consult with local police or other agencies as to whether or not you should make a report. Where the local agencies do not engage, schools may be able to reach out to the police and/or government agencies from the country of origin of the alleged perpetrator or children concerned, depending on their nationality. For example, the FBI Violent Crimes against Children unit investigates worldwide cases where American citizens are victims or alleged perpetrators of child crimes. Extraterritorial legislation (such as in the UK, Australia, and Canada) enables the investigation and prosecution of crimes committed by their nationals abroad. In some cases, a victim and/or their parents may ask or instruct the school not to report the allegation to any external agency and not to share the details of the allegation with anyone. This should not deter reporting.

Initial evaluation of allegation

Depending on the nature of the allegation and your external agencies' thresholds, it may be necessary to take some preliminary steps to evaluate the allegation prior to deciding on a course of action. These steps should only be taken after obtaining legal advice, as above, and may include, for example, reviewing the personnel files and child protection records, and contacting referees and teachers where the alleged perpetrator may have previously taught.

Safeguarding

- ✓ Put in place a safety plan for the victim.

Identify the child's needs and put in place a safety plan to support the child and family, which should:

- include any relevant information about the background of the child, including, for example, their home background and any mental health needs;
- involve the child and the child's parents (assuming there are no legitimate reasons not to, such as where doing so would put the child at risk of harm) in preparing the safety plan. Consider:
 - what the child wants to happen and who the child would like to be supported by, both inside and outside school;
 - what language the child feels most comfortable communicating in and how the school can accommodate this; and

- how the parents and wider community might respond, considering the cultural or religious context, and what steps can be taken to mitigate and/or protect the child from any harmful responses;
 - consult with and draw upon support provided by external agencies and any other organisations or experts. Consider whether any targeted interventions are needed to address any wider safeguarding issues, mental health needs, or trauma;
 - assess the risks that are faced by the child (for example, emanating from the abuse or wider safeguarding issues). This may include:
 - appointing a trusted member of staff to support the child;
 - asking the child's teachers to be accommodating to the child's needs and to make allowances where necessary;
 - facilitating the delivery of health (including sexual and mental health) services and additional educational support;
 - providing the child with information about further services;
 - considering other forms of redress, which are set out below;
 - consider how to build on strengths and positive aspects that the child possesses and/or is exposed to through trusting relationships with the child's family, other students, or staff;
 - set out the steps needed to implement the safety plan; and
 - be reviewed at regular intervals to ensure that real progress is being made which benefits the child.
- ✓ Prevent further harm.

Determine, in consultation with legal advisers and any external agencies, how to identify and protect any further victims within or outside the school community (locally or in other countries), including children or dependents of the alleged perpetrator. Communications to staff, parents, and children at the appropriate time (to the extent possible and appropriate) about the allegation and encouraging them to share any concerns with a named adult can, in some circumstances, be a good way to encourage individuals to come forward. Legal advisers and any external agencies should be consulted prior to any communications being sent, and the school should consider consulting with a communications advisor regarding the communications and any media inquiries/responses.

Information sharing and communications

- ✓ Inform the Chair of your Board and decide who else needs to be informed, ensuring no facts are disclosed which would hinder any future investigation or inquiry or violate data protection or employee or student rights. The response team leader should regularly update the Board Chair (or another Board member as appropriate) on all material developments.

- ✓ Appoint one person from your response team to be responsible for communications. Make sure they are aware of all the facts and that they keep this information confidential and secure until it needs to be communicated. Provide this person with authority to consult with a communications advisor regarding the communications and any media inquiries/responses.
- ✓ Decide whether any other external body needs to be informed at this time, such as any inspection, accreditation, regulatory, or insurance bodies. Decide what information should be provided, how it should be provided, and what should/can be done to protect confidentiality.
- ✓ Consult with your legal advisers and any external agencies prior to any communication being sent, including any communication to the victim and their family, the alleged perpetrator, staff, the wider school community, and/or the media.
- ✓ Develop a set of talking points and, where possible and appropriate, seek input from relevant members of your response team, your legal advisers, any external agencies, and possibly a communications advisor. Make sure that what you communicate is consistent with any legal restrictions, such as privacy rights and defamation laws.

The person responsible for communications should begin to find answers to the following questions, with input from the DSL:

- Who knows about the allegation? What is the likelihood of the allegation becoming known more widely? What can be done to prepare for the allegation becoming known more widely?
- What should be communicated to the child and their parents at this stage?
- How should the school reassure the child and their parents, other children and the parent body, the alleged perpetrator, your staff, and wider school community?

Record-keeping

- ✓ Create an incident file which includes all relevant dates and times, days of week, summaries of conversations with external agencies and advisers, and an action log which sets out any actions taken and the decision-making process.

This file should be kept confidential and secure (such as in a locked cabinet or as an encrypted digital file). Access to this file should be limited to a small number of named people (for example, the Head/Principal and DSL). If another person needs to have access to the file they should apply in writing for permission and be prepared to justify their request. A record of the allegation and its outcome should be kept in the adult's personnel file, even after the alleged perpetrator has left the school.

- ✓ Consider maintaining a separate file with a short description of all allegations made against adults who work with children, with access restricted to the Head/Principal and another member of senior management.
- ✓ Record any information relevant to the welfare of a child separately on that child's file.

Decide on a course of action

Investigation by external agency or inquiry commissioned by the school?

In consultation with your school's legal advisers and any external agencies, consider the scenarios on the next page. Depending on how events unfold, you may need to move between scenarios. For example, if the police and/or child protection services decline to investigate initially and the school uncovers further evidence which suggests criminal activity, it should report this immediately to the police who may then choose to investigate. Equally, where the police complete an investigation, the school may still need to conduct its own safeguarding inquiry and/or evaluation of suitability. This is because:

- the police will be working to a criminal threshold, whereas your school must determine if the alleged perpetrator is unsuitable to work with children; or
- the decision not to pursue an investigation or prosecution may be the result of several factors which do not mean that the alleged perpetrator did not do what they are accused of doing, and/or that the alleged perpetrator is necessarily suitable to work with children. These include, for example, lack of evidence, procedural failings, corruption, and a higher standard of evidence for criminal charges.

Scenario 1 – external agency investigates the allegation

1. Police (either local or from the alleged perpetrator's and/or the victim's country of origin) carry out a criminal investigation to determine whether the alleged perpetrator has committed a crime.

or
2. Police do not investigate but another external agency does. This scenario will only apply in a limited number of jurisdictions where agencies other than the police (for example, child protection agencies, government departments, local authorities) have their own investigation powers.

Next steps:

1. Cooperate with external agencies and ensure that you do not do anything which could jeopardise the external agency's investigation. Law enforcement agencies may not be able to share much information with the school, in order to protect the integrity of the investigation and to protect privacy rights of the victims. Maintain communications with the agency to the extent possible.
2. Your school may wish to conduct an inquiry concurrently to the investigation carried out by the external agency, or to conduct one following the investigation.

Scenario 2 – external agency does not investigate the allegation

1. School refers to external agencies, but these agencies do not investigate.

Next steps:

1. Even if the external agency does not investigate, it is important to ensure that any advice they have provided to your school is followed where possible.

Consider whether to carry out an inquiry to determine the facts and appropriate actions, and/or to commission an external suitability assessment to determine the alleged perpetrator's suitability to work with children.

Inquiry – considering an evaluation of suitability

When external agencies do not investigate, or their investigation is inconclusive or unreliable, the school should consider carrying out an inquiry to determine the facts and appropriate actions. The nature and scale of the school's inquiry will differ significantly according to the specific circumstances of the allegation, any relevant internal policies (for example, child protection and/or staff disciplinary), and local employment law. Expertise is required to carry out an inquiry into allegations of child abuse, and if your school does not have sufficient internal expertise you should appoint an external expert. An expert outside of your school will typically also provide more objectivity and credibility to the community than an inquiry conducted by an employee of your school. The expert should be trained and experienced in carrying out inquiries into allegations of child abuse by adults, acting as independently as possible. To ensure that the inquiry is independent from the school's handling of the allegation, the individual carrying out the inquiry should not be a member of the response team. Your school may be operating in a region where local INGOs play a significant child protection role and can assist with any inquiries.

Sometimes it will be possible to carry out an inquiry without your wider school community becoming aware of the details of the allegation. Other times, members of the wider school community may become aware of the allegation. The inquiry will be interested in evidence which raises concerns about professional misconduct, but also evidence that supports the integrity of the alleged perpetrator.

Evaluation of suitability

- ✓ Attempt to secure the cooperation of the alleged perpetrator, as this will provide an opportunity to determine their fitness to be around children.

As a finding of professional misconduct can have severe implications for the alleged perpetrator and can lead to restriction on future practice or termination of employment, it is important that any inquiry is robust and that the various accounts are explored as fully as possible.

If you feel after conducting an inquiry that there is insufficient evidence to make an informed decision, consider engaging an external expert with relevant skills and experience, such as a forensic psychologist, to carry out an evaluation to determine the alleged perpetrator's suitability to work with children. Conducting an evaluation of suitability to work with children is a highly specialised process requiring in-depth knowledge of alleged perpetrator behaviour and skills to examine fairly what can be sensitive information.



Guiding question

'Is this person suitable to work with children?'

This question must be considered even where a criminal investigation does not proceed.



Evaluating sexually inappropriate behaviour

A clinical evaluation of suitability with an individual accused of sexually inappropriate behaviour relies initially upon an exploration of the alleged perpetrator's account in comparison with the evidence of the victim and others. Then the perspectives and beliefs expressed can be compared with clinical research and insights into those who have admitted sexually abusive behaviour. It is impossible to be conclusive where denial is maintained. The best that such an evaluation of suitability can offer is whether the perceptions and behaviours highlighted are consistent with what would be expected from someone who might behave in a sexually inappropriate manner.

Ongoing considerations

Once a general course of action has been determined, consult with your school's legal advisers and any relevant external agencies to address the following questions.

How will your school work with external agencies (and not against them)?

Make clear to all involved that the priority is the well-being of any children involved. In many jurisdictions it is a requirement to inform law enforcement immediately after receipt of child sexual abuse allegations. If an external agency has convened a meeting to discuss the case, decide who from your school will attend and what your school wants to achieve. Determine who in your school will communicate with external agencies and implement the agreed actions.

Will police or an external agency be coming on site (for example, to make an arrest or conduct a search)?

If yes, discuss with the police the best approach so as not to cause unnecessary anxiety to your school community. For example, can the police arrest the alleged perpetrator at home or arrive in school in plain clothes and an unmarked vehicle?

When and how should you inform the alleged perpetrator of the allegation?

Although the alleged perpetrator should be informed of the allegation as soon as is reasonably possible, informing them too early could 'tip off' the individual and give them time to destroy evidence. Always seek advice from and consult with your legal advisers and any relevant external agencies before informing the alleged perpetrator.

How should you communicate with and support the alleged perpetrator?

The incidence of suicide amongst individuals who are the subject of allegations is high. Depending on the jurisdiction and location of the school, the local law enforcement may be responsible for a suicide strategy and offender welfare. In addition to liaising with the external agencies where appropriate, be open and transparent with the alleged perpetrator at the appropriate time, explaining the nature of the allegations, the process that will be followed, and the possible consequences. Take care that the alleged perpetrator has a good support system. If relevant, provide support to the alleged perpetrator's family. Refer them to counselling and advise them to seek independent legal or trade union representation. Appoint someone in school to be their point of contact. This person should not have a role in the investigation and should be independent of it. Keep them informed of developments in the process.

Is immediate dismissal and referral to any competent national authorities appropriate?

There are often clear child protection, communications, and reputational advantages to immediate dismissal. However, this decision should only ever be taken where appropriate in light of the evidence and your school's duty to the alleged perpetrator. Seek advice from local employment lawyers to understand the legal, regulatory, and reputational risks involved.

Should you suspend the alleged perpetrator, with or without pay, pending the outcome of an investigation by an external agency or an inquiry commissioned by the school?

Subject to local law, it may be appropriate to suspend the alleged perpetrator if their continued presence in the school is (i) necessary to protect children, (ii) potentially putting children at risk, (iii) likely to influence an investigation or inquiry, or (iv) necessary to maintain confidence in the school.

Where the alleged perpetrator is suspended, their keys and laptop should be secured and access to the school server cut off. Consider what the suspended alleged perpetrator is able to communicate and what the school should communicate to their community about their absence. Where the alleged perpetrator is to have a continued presence in the school, carry out a written assessment of the risks and agreed strategies for minimising the risks. This would need to take account of the fact that children can be accessed within a school even when it is not in the alleged perpetrator's day to day duties. Continued presence would need to be based on a very clear and justifiable risk management plan.

What actions should your school take if the alleged perpetrator resigns?

The school should inform any external agencies involved in investigating the allegation. The investigation should continue despite the resignation so that it can determine the facts as far as possible and reach a conclusion. This will enable your school:

- to refer the alleged perpetrator to any competent local or national authorities, including in the country where the school is located but also in the alleged perpetrator's country of origin (see [reporting obligations](#));
- to disclose details of the allegations and investigation findings in any reference (subject to local law, see [providing references](#));
- to take action to protect against future abuse; and
- to maintain credibility in your school community.

If police are involved and investigating, they will notify international law enforcement partners as required. Seek legal advice regarding your obligation to report the allegations and findings to potential future employers in any jurisdiction.



Important points to remember

- *Never* agree with the alleged perpetrator that they can 'leave quietly'. It is not acceptable under any circumstances to sign a confidentiality or non-disclosure agreement or to enter into a settlement agreement where that agreement prevents the school from completing an investigation, reporting the allegation to external agencies, or disclosing details of the allegation in a reference.
- *Do not* facilitate the alleged perpetrator's travel out of the country when they are the subject of an inquiry or under investigation.
- *Do not* encourage the alleged perpetrator to resign.
- *Do not* undertake non-renewal of the alleged perpetrator's contract as a means of removing the problem.

Schools may consider these actions as easy solutions, but in fact they may put other children at risk of serious harm and transfer the problem to another school. Your school's reputation could be at risk if abuse is uncovered later, and it comes to light that your school did not act appropriately or acted unfairly to an innocent member of staff who may be subject to rumour and gossip which in turn may damage their career.

Safeguarding considerations

- ✓ Protect the victim and their family.

The safety plan set out above should be regularly reviewed so that the school can continue to support the victim and their family for the duration of the child's time at the school and, in some cases, after the child has left the school.

- ✓ Protect any additional victims who come forward.

Treat them in the same manner as any previous victims. Provide appropriate interventions and support for any victims who come forward. Meet with victims and their families so they can explain their experiences first-hand.

- ✓ Protect other children in the school.

Implement any immediate changes to your school's systems and policies which the allegation has shown to be deficient (for example, supervision of children on school trips, choice of activity providers). Consider delivering small group sessions in an age-appropriate way to address specific educational needs. For example, if the abuse involved children exchanging indecent images of themselves with an adult, sessions addressing this issue are needed.

- ✓ Protect and support staff.

Allegations of abuse can be traumatic for the school community and can create a tense working environment for staff. In addition, staff may be experiencing a range of powerful emotions including guilt, disgust, anger, fear, and deep sadness. At the same time, they are often expected to support any children, families, or colleagues who may have been directly involved. Consider taking the following steps:

- Allow staff to talk about the situation when they need to in appropriate settings.
- Show strong leadership to continue school life as normally as possible.
- Schedule specialist sessions with small groups of staff to help them to process their emotions and answer questions from children.
- Build trust with informal check-ins.
- Offer one-to-one sessions with clinical psychologists to any staff who feel particularly affected by the allegation.
- Reduce workload or allowing time off for staff who are particularly affected by the allegation.
- Update staff on developments where possible and appropriate and debrief staff once any investigation and/or safeguarding inquiry is complete. Consult with legal advisers about what can and cannot be communicated.

Making a decision

Where your school's inquiry is complete, or where the external agency provides sufficient information to enable your school to make a decision on the alleged perpetrator's employment, your school needs to decide what action to take, consulting with legal advisers and following your staff disciplinary and safeguarding policies. This may take the form of a disciplinary hearing. The person selected to hold any hearing should typically not have been involved in managing the allegation previously and should hold a senior management position or be a governor. Ordinarily the Head/Principal or a governor/trustee will hold the hearing. As set out above, the principles of natural justice should be followed, which require the details of the allegation to be provided to the alleged perpetrator who should be given the opportunity to put forward a defence and should be provided with a right of appeal. Where the person holding the hearing finds that the individual poses a risk to children, their contract should be terminated. Subject to legal advice and the school's policies, this should normally be by way of dismissal.

Reporting obligations when an individual is dismissed for child protection reasons

Some jurisdictions require employers to refer individuals who have been dismissed for child protection reasons to national authorities, such as regulatory or criminal records bodies, or agencies responsible for barring someone from working with children in the future. National professional registration bodies, such as educator licensing or certification agencies, should also be notified. The evidence gathered during the inquiry may need to be shared with these agencies. It may be necessary to redact identifying details before releasing these documents.

Providing references for the alleged perpetrator

Failing to properly disclose the findings of the investigation and reasons for dismissal in a reference could place a child at risk in the future. It could also subject your school to a claim for negligent misrepresentation by the subsequent school employing the individual. Similarly, it could also result in significant reputational damage, as the accurate perception would be that your school is passing along to the next school an employee who poses a risk to students.

At the same time, schools should be mindful of their obligation not to defame individuals in references or to violate their privacy rights. Typically, the truth is a defence to a defamation claim, but the 'truth' is subject to dispute in litigation. Local law differs significantly on these issues and your school should always seek advice from legal counsel familiar with local and national laws and, when in doubt, approval from your insurer, before providing a reference in this context.

Reinstating and managing the reintegration of an alleged perpetrator

An individual should be reinstated only when the school is confident that they do not pose a risk of harm to children. It follows that there should not be restrictions placed on the individual's access to children post-reinstatement. Training on issues like professional boundaries and monitoring post-reinstatement may be needed to ensure, for example, that any breaches of the staff code of conduct are not repeated. Where the adult has been



Shared leadership between schools requires forthright and honest communications, including accurate factual references, free from conjecture, which demonstrate that student safety and well-being is paramount.

absent from work and/or where the allegation is widely known, consider how to communicate their return and how to support their return to work and the community.

Responding to legal action against the school

If an adult abuses a student at your school, it is possible that the child and/or their family may file a lawsuit against the school. Any employer can in certain circumstances be liable for the actions of its employees or of people akin to employees (such as governors or volunteers). The law in this area is complex and it would be prudent for a school faced with a possible civil claim to seek legal advice at an early stage. School insurance policies ordinarily cover such claims (subject to an excess/deductible). While the insurer will usually appoint one of its panel lawyers to act, your school should establish at the outset the scope of the lawyer's role, your school's rights to information and to participate in decisions as a client, and the lawyer's approach to abuse litigation. Work with your school's insurer and law firm to ensure that they run the claims in a way that your school is comfortable with, including issues such as liability, limitation periods, apologies and settlement agreements. For more information, please see the [resources](#) section.

Your school may also face legal action from the alleged perpetrator. While you should be aware of the risk that the alleged perpetrator could file a claim for unfair/wrongful dismissal and/or defamation, the more important obligation is your school's duty to protect children. Understand your potential liability under local employment and privacy law, review your current insurance coverage, and promptly notify your insurance carrier about any potential claim. But do not allow the threat of a claim to deter further action, such as conducting an inquiry or an external assessment.

COMMUNICATION PRINCIPLES

General advice

Take steps to prepare. Have a crisis communications plan prepared in advance. Practice with case studies.

Identify your constituents. Remember that your school will be communicating with many different audiences, including the victim and their parents, any children affected by the incident, the alleged perpetrator, staff (both current and past), other parents, alumni, and the media. However, communication with the victim and their family and the school community is your priority. They will want to hear from the school before they read about it in the media. This includes both print and social media.

Take enough time to get the first communication right. Be careful in your initial communication and make sure that whatever facts you provide are accurate. Your school's credibility will be questioned if the initial communication is inaccurate. But keep in mind that media deadlines do not wait for leisurely decision-making and debate. Show leadership and act as quickly as possible.

Be clear in the communications and always tell the truth. Media and school stakeholders may focus on your school's failure to properly and transparently communicate about allegations and findings. A cover-up is fatal and can quickly become the focus of the media story.

Maintain confidentiality where possible and appropriate. Seek legal advice about your duties to the victim and the alleged perpetrator. In some jurisdictions the publication of any information (including in a letter to the school community) that identifies the victim of abuse and/or the alleged perpetrator is a criminal offence. In other jurisdictions, there are strict defamation and/or privacy laws where the naming of an alleged perpetrator creates significant legal risk.

Use common sense and be compassionate. While legal advice is very important, the school should not take legal advice to the exclusion of all other considerations. Ultimately, the school should make a decision that places the safety of current and former students first.

When details of an allegation become public knowledge

Establish the narrative first. If an allegation is first shared publicly outside the school, it is difficult to catch up to the external narrative and regain trust. Your school may be seen as uninformed or as having withheld information. Reassure the community that your school is taking the matter seriously and has put in place measures to protect children. Provide talking points to your board members and explain how your staff and members of your school community should respond if they are contacted by the media.

Anticipate the media becoming involved early on. Consider preparing a communications timeline as to when any communication to your community will be going out and draft appropriate responses. When needed, coordinate and share communications with external agencies.

Communicating with your school community. Where details of the allegation have become public, it may be appropriate to communicate with the wider school community. For example, inviting individuals to come forward with relevant information allows your school to learn if there are other victims. Be clear to the community how they should report concerns. An open letter to the community will demonstrate your school's priority and commitment to the welfare of your students. Inviting parents or alumni to the school to discuss the allegation can be very helpful in certain circumstances. Conversely, saying nothing or very little is very risky and can increase the reputational and legal risks facing your school. Parents and alumni now expect timely and transparent school communications on allegations of abuse.

Responding to the media

If your school learns that the media is about to publish a story concerning allegations of sexual misconduct that you were previously unaware of, consider drafting a holding statement to issue to your community and then to the media. A holding statement is a relatively short communication acknowledging that allegations have been made, that children's safety is the school's top priority and, where appropriate, that the school is cooperating with appropriate external agencies. Your school can write a second communication later when more information is available.

Consider using your community letter as your media statement, rather than crafting a separate media statement. The community letter will typically be more comprehensive than a media statement. In any event, the letter to your community is likely to be obtained and used by the media.

Media may receive information about allegations from external agencies, or from victims, friends of victims, or social media postings, before your school is aware of an allegation. You may not be able to control when a media story may appear.

Your school's security personnel should be prepared to manage members of the media who may arrive at the school. Before any communication goes out to your community, share the communication with your school board and school employees.



Communications guidelines

- ✓ Do not wait for a crisis to happen before you act.
- ✓ What factors govern or limit communications? Check your safeguarding policies and consider any statutory rules about anonymity.
- ✓ Ensure communication between your legal and communication advisers.
- ✓ Take enough time to get the first communication right.
- ✓ Be honest and transparent.
- ✓ Get the tone right by putting yourself in the shoes of the recipient.
- ✓ Remember, anything written or said may be quoted and may be used in legal proceedings.

FOLLOWING AN ALLEGATION

Debriefing and safeguarding review

- ✓ Review your school's handling of the allegation with your allegations management team, identifying any weaknesses in the school's systems, understanding what can be done better or differently in the future, and revising procedures and training accordingly.

This can be done internally with different parties reflecting on lessons learned and recommending actions for the future. In some instances, you may wish to commission a formal review or audit to review the incident and improve practice. There are many different types of review available and your school should consider advance references carefully before contracting with a specialist to conduct the review. If the review team is going to interview children, victims, or possible victims of abuse, then their team should include a child protection specialist with experience and training in interviewing victims of abuse, to avoid any re-traumatisation.

Redress for victims

- ✓ Consult with victims and other individuals affected by the abuse.

Discuss steps that your school can take to provide redress to individuals. Some options include:

- the opportunity to participate in an external review;
- the opportunity to tell their story and discuss their experience privately with members of the school board or leadership team;
- the opportunity to be involved in strengthening the school's procedures going forwards;
- setting up memorial lectures;
- funding research into organisational abuse; and
- internal review of honours or awards given to the offender, such as named buildings, scholarships, etc, including whether to withdraw them.



Debriefing questions

- Has the incident highlighted any training needs for staff, parents, or children?
- Did the allegation reveal inadequate boundaries between children and adults in the school?
- Did children, staff, or parents have concerns about the adult and did they raise these with anyone? If so, how were these concerns dealt with? If not, why not? How can a safer culture be created for disclosing concerns?
- How was the adult recruited? Can safer practices in the recruitment process be implemented?
- How did the adult gain access to the victims and are there lessons to be learned?
- How did the school support and care for the victims and was this appropriate? Could more have been done?
- Has the incident highlighted any weaknesses in the school's systems or procedures (such as transports, physical layout of buildings, or trips approval process)?

GLOSSARY OF TERMS

abuse	<p>a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children</p> <p>(Department for Education, England)</p> <p>for other definitions of abuse please see the sources listed on page 5 of the protocol.</p>
accreditation protocol	<p>process and procedures for the evaluation and accreditation of schools aligned with a set of standards and validated via the school's self-study and external peer review</p>
allegation	<p>any concern that an adult working in school has:</p> <ul style="list-style-type: none">a) harmed or abused a child, including physical, emotional, or sexual harm or abuse, exploitation, and neglect;b) behaved in a way that could constitute a criminal offence towards or related to a child; orc) behaved in a way that indicates they are not suitable to work with children
allegations management team	<p>cross-functional team comprised of school staff and professionals with specialised expertise to help the school to prepare for an allegation and to provide a source of expertise for the Team Leader to draw on when coordinating the school's response to an allegation</p>
alleged perpetrator	<p>the adult who has been accused of abuse towards a child</p>

child	any person aged under 18 or in receipt of educational services from the school
child protection or safeguarding	<p>protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of their right to safe and effective care; taking action to enable all children to have the best outcomes.</p> <p>(The terms child protection and safeguarding are used interchangeably in this document.)</p>
Child Protection Officer (CPO) or Designated Safeguarding Lead (DSL)	individual member of staff who has overall responsibility for safeguarding in school. Their role typically includes receiving and acting upon child protection concerns, ensuring that the school’s child protection policy is implemented and promoted, ensuring effective safeguarding training for staff and safeguarding practice across the wider school community. Depending on school size and capacity, this person could be the Head/Principal and/or the lead person whose role it would be to manage the school’s response to an allegation of abuse against an adult working in school.
code of conduct/behaviour	principles upon which all adults working in school are expected to base their conduct and professional practice; can also be referred to as ‘ethics’
disclosure/partial disclosure	process of providing descriptive information associated with a claim or allegation. Partial disclosure omits specific information and can be intentional in order to test the recipient’s response. It is not uncommon for children to recant the initial disclosure; this does not mean abuse did not occur.
evaluation of suitability	a clinical evaluation of the suitability of the alleged perpetrator to work with children
evaluation standard	requirement of an accreditation or inspection protocol against which a school is evaluated for effectiveness
executive committee	committee within a board of an organisation which has the authority to make decisions and ensures that these decisions are carried out
grooming (online and in person)	the use of a variety of manipulative and controlling techniques with a vulnerable subject used in a range of settings to establish trust and/or normalise sexually harmful behaviour with the overall

aim of facilitating abuse and/or prohibiting exposure. Grooming may happen over long periods of time or rapidly. It may include manipulation of family members, colleagues, and organisational practices in addition to victims. Grooming with intent to sexually abuse is illegal in some jurisdictions.

Head/Principal	chief educational officer of the institution. A wide variety of terms depict this role, including Director, Head of School, Head Teacher, Principal, and Superintendent.
historic abuse (non-recent abuse)	an allegation of non-recent abuse has been defined as ‘an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the victim was under 18 years old.’ (NSPCC)
initial evaluation	preliminary steps taken to evaluate an allegation, either where external agencies will not engage unless the school has more information or where there is not enough evidence to report the allegation to external agencies. These steps should only ever be taken following legal advice and, where possible, a discussion with an external agency.
inquiry	process followed by the school to determine the facts of an allegation and appropriate actions. This can be carried out internally by the school or by an external consultant
investigation	a process carried out by an external agency to determine whether the alleged perpetrator has done what they have been accused of doing. Such investigations will ordinarily be carried out by law enforcement to determine whether the alleged perpetrator has committed a crime.
mapping exercise	a review of particular issues or child protection concerns within a local area, in order to design and develop effective interventions
president	similar in scope and responsibility to the Head/Principal, but may also signify an honorary role, or an expanded business management role
sexual abuse	any act that exposes a child to or involves a child in sexual processes beyond his or her understanding or contrary to accepted standards. Sexual abuse may be perpetrated by adults or carried out by children. Activities may involve physical contact, including assault by female

genital mutilation or cutting, early marriage, penetration or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing; they may also include non-contact activities, such as voyeurism, involving children in viewing or producing sexual images or activities, encouraging children to behave in sexually inappropriate ways, use of explicit sexual language, or grooming a child in preparation for abuse (including via the internet)

(Australia Royal Commission and NSPCC)

staff

all former and current teaching, residential, pastoral, support, peripatetic and contract staff, leaders, volunteers, governors/trustees, owners, and any other adults working in an international school setting on any basis, including contract, employment and volunteer

trauma-informed approach

counselling method which realises the widespread impact of trauma and understands potential paths for recovery; recognises the signs and symptoms of trauma in clients, families, staff, and others; responds by fully integrating knowledge about trauma into policies, procedures, and practices; actively works to prevent re-traumatisation

victim

the person who has allegedly been abused. Many victims prefer to be referred to as a 'survivor', particularly in cases of non-recent abuse.

RESOURCES

Safer recruitment

- ICMEC Recruitment Practices, [Recruitment Practices](#)
- The International Taskforce on Child Protection (updated April 2017), [Recommended Recruitment and Screening Practices](#)

Offender patterns and information

- Australia Royal Commission, [Grooming and Child Sexual Abuse in Institutional Contexts](#)
- Darling, Hackett and Jamie (2018), [Female Sex Offenders Who Abuse Children](#)
- ICMEC Education Portal, [Incident Response](#)
- ICMEC Education Portal, [Serious Case Review](#)
- Lanning, K. and Dietz, P. (2014), [Acquaintance Molestation and Youth-Serving Organizations](#)
- McGee, H., Garavan, R., De Barra, M., Byrne, J., Conroy, R. (2002), [The SAVI Report: Sexual Abuse and Violence in Ireland](#)
- Safeguarding Unit, Farrer & Co (January 2016), [Grooming within organisations – how to keep children safe](#)
- Safer Recruitment Consortium, [Guidance for Safer Working Practices for those Working with Children in Educational Settings](#)
- Sullivan, J. (2009), [Professionals who sexually abuse the children with whom they work](#), University of Birmingham (Doctoral dissertation, Thesis)

- Tanner and Brake (2013), [Exploring Sex Offender Grooming](#)
- Wonnacott, J. and Carmi, E. (2016), [LSCB Case Review: SB International School](#)
- United Educators, [Educator Sexual Misconduct: Policy and Audit Guide for Protecting Children](#)

Reporting child abuse

- ICMEC, [Role of Mandatory Reporters](#)
- ICMEC Education Portal, [Global Reporting Mechanisms](#)
- [National Society for the Prevention of Cruelty to Children](#)
- Society for Human Resource Management, [Sample Whistleblowing Policy](#)

Responding to allegations of child abuse by educators and other adults

- England, Department for Education (September 2018), [Keeping Children Safe in Education](#)
- England, Department for Education (July 2018), [Working Together to Safeguard Children](#)
- ICMEC Education Portal, [Incident Response](#)
- ICMEC Education Portal, [Multidisciplinary Teams](#)
- Safeguarding Unit, Farrer & Co (April 2016), [Handling allegations of non-recent abuse](#)

- Safeguarding Unit, Farrer & Co (May 2017), [Safeguarding Children: dealing with low-level concerns about adults](#)
- Second Step Child Protection Unit (2014), [Responding to Disclosure](#)
- The London Safeguarding Children Board (2017), [The London Child Protection Procedures, Paragraphs 7.2.8 to 7.2.11](#)
- WHO Clinical Guidelines (2017), [Responding to children and adolescents who have been sexually abused](#)

Rights and statutory guidance

- ICMEC Education Portal, [National & International Laws – including country specific legislation in English](#)
- The United Nations (November 1989), [Convention on the Rights of the Child in Child Friendly Language](#)
- The United Nations, [International Conventions and Legal Instruments on Rights of Child](#)

School policies

- Association of International Schools in Africa (October 2016), [Child Protection Handbook](#)
- England, Department for Education (September 2018), [Keeping Children Safe in Education](#)
- ICMEC Education Portal, [School Policies](#)
- International Task Force for Child Protection (February 2016), [New Standards for Child Protection Adopted by School Evaluation Agencies](#)

Support for victims and families

- ICMEC Education Portal, [Support](#)
- National Child Traumatic Stress Network, [Educator Guide to Appropriate Response and Support](#)
- National Child Traumatic Stress Network, [Trauma Training Toolkit: Reading and Resources](#)

Training for school communities

- [Blink Think Choice Voice](#)
- ICMEC Education Portal, [Curriculum Resources](#)
- ICMEC Education Portal, [Family Resources](#)
- ICMEC Education Portal, [Training](#)
- National Society for the Prevention of Cruelty to Children, [Let's Talk Pants Programme](#)
- National Society for the Prevention of Cruelty to Children, [Support for adults abused as children](#)

Other resources

- U.S. Department of State, Office of Overseas Schools, [Regional Education Officer Contacts](#)
- The National Association of Independent Schools and The Association of Boarding Schools (2018), [Prevention and Response, Recommendations for Independent School Leaders from the Independent School Task Force on Educator Sexual Misconduct](#)