



THE **COMMUNITY**
FOR LEARNING

Child Protection Policy

Prevention, Intervention & Support

Revised 2025

Table of Contents

TCFL CHILD PROTECTION POLICY.....	3
PURPOSE AND AIM.....	4
DEFINITIONS AND INDICATORS.....	5
Child Maltreatment.....	5
Child.....	5
Grooming.....	5
Risk Factors.....	6
Types of abuse.....	6
MANDATORY REPORTING.....	10
CHILD PROTECTION TEAM.....	11
Roles and responsibilities.....	11
CASE MANAGEMENT PROCEDURE.....	13
STEP 1: Reporting.....	13
STEP 2: Information gathering.....	13
STEP 3: Intervention.....	13
STEP 4: Follow-up.....	14
TCFL CHILD PROTECTION PROCEDURE.....	15
Documentation.....	15
TRAINING.....	16
Training process.....	16
RECRUITMENT.....	17
CONCERN FORMS.....	17
TCFL CODE OF CONDUCT.....	18
REFERENCES.....	21

TCFL CHILD PROTECTION POLICY

TCFL is committed to providing a safe and supportive environment for all students, families and the TCFL community.

We will ensure that this policy is available to all parents via our website and that we will carry out annual training with all faculty and staff. TCFL will make every effort to implement hiring practices to ensure the safety of children. In the case of allegations made against a member of the staff, a careful and confidential investigation will be conducted.

We have based our child protection policy on national and international laws. Our policy is based on the Dominican Republic Law 136-03 (Code for the Protection System and the Fundamental Rights of Children and Adolescents) and the United Nations Convention on the Rights of the Child.

DOMINICAN LAW 136-03

The principal articles relevant to this policy within Dominican Law 136-03, include:

Article 13: Right to Personal Integrity. All children and adolescents have the right to personal integrity. This right includes respect for dignity, inviolability of physical, mental, moral and sexual integrity, including the preservation of their image, identity, autonomy of values, ideas, beliefs, spaces and personal objects. Paragraph.- It is the responsibility of the family, the State and society to protect them against any form of exploitation, mistreatment, torture, abuse or neglect that affects their personal integrity.

Article 14: Right for abuse to be reported. The professionals and officials of the areas of health, pedagogy, psychology, social work and law enforcement officers, directors and officials, both public and private, and any other person who in the performance or not of his/her functions had knowledge or suspects a situation of abuse or violation of the rights of children and adolescents, are bound to report it to the competent authorities, being exempt from criminal and civil liability, with respect to the information they provide.

UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD

The principal articles relevant to TCFL in the UN Convention on the Rights of the Child, include:

Article 3: The best interests of the child must be a top priority in all decisions and actions that affect children.

Article 12: Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously.

Article 19: Protection from abuse and neglect –The State shall protect the child from all forms of mistreatment by parents or others responsible for the care of the child and establish appropriate social programs for the prevention of abuse and the treatment of victims.

Article 39: Children who have experienced neglect, abuse, exploitation, torture or who are victims of war must receive special support to help them recover their health, dignity, self- respect and social life.

PURPOSE AND AIM

The purpose of this policy is to protect our community and create awareness about child abuse and neglect, how to prevent it, identify it and intervene in suspected cases at our school. Also, provide clear expectations about child safety and the school's response to concerns or allegations of harm to students.

This child protection policy aims to:

Ensure the wellbeing of all students regardless of age, gender identity, ability, religion, nationality, etc.

Provide a safe environment in which everyone feels protected, respected, and listened to. Where students, staff and families feel confident to express concerns.

DEFINITIONS AND INDICATORS

For all intents and purposes, this policy will refer to the following definitions and concepts:

Child Maltreatment

The World Health Organization (2020) defines child maltreatment as *“the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”*

Child

A Child is a human being under eighteen years of age, unless under the law applicable to the child majority is attained” (UNICEF, 1989). Up to twelve years of age our students are children and after twelve and until twenty one years old they are adolescents.

Grooming

According to the National Society for the Prevention of Cruelty to Children (2023) When a person builds a relationship of emotional connection and trust with a young person with the objective of manipulating, abusing them or hurting them is called grooming. Children and young people can be groomed by anyone, it could be a stranger or someone they know and it can happen online, in person or both. Groomers can also build a trust relationship with the young person's relatives or friends and lie about who they are, pretending to be someone else.

Risk Factors

A child must always be considered a victim and not blamed for any kind of maltreatment or abuse they suffer. Some risk factors that may increase the likelihood of it happening to a child are:

- Being under four years old or an adolescent.
- Being an unwanted child or not fulfilling parental expectations. Having any kind of special needs, disability or impairment.
- Being identified as part of the LGBTQ+ community.
- Being non-neurotypical and/or having different intellectual or neurological capacities.

At TCFL we understand that all of our students must be protected from any kind of maltreatment and we use this term interchangeably with child abuse. A person can abuse a child by inflicting harm or by failing to act to prevent harm.

Types of abuse

There are many types of maltreatment classifications. This policy will consider the following ones for its purposes:

Physical Abuse

Abuse that may involve hitting (with hand or other item), punching, shaking, throwing, poisoning, biting, kicking, burning or scalding, drowning, suffocating, sustained physical activity or sustained physical restraint, or otherwise causing intentional physical harm to a child.

Signs of physical abuse that may or may not be present: — Bruises, burns, sprains, dislocations, bites, cuts — Improbable excuses given to explain injuries — Injuries which have not received medical attention — Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc. — Repeated urinary infections or unexplained stomach pains — Refusal to discuss injuries — Withdrawal from physical contact — Arms and legs kept covered in hot weather — Fear of returning home or of parents being contacted — Showing wariness or distrust of adults — Self-destructive tendencies — Being aggressive towards others — Being very passive and compliant — Chronic running away

Emotional Abuse

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

Signs of emotional abuse that may or may not be present: — Physical, mental and emotional development is delayed — Highly anxious — Showing delayed speech or sudden speech disorder — Fear of new situations — Low self-esteem — Inappropriate emotional responses to painful situations — Extremes of passivity or aggression — Drug or alcohol abuse — Chronic running away — Compulsive stealing — Obsessions or phobias — Sudden under-achievement or lack of concentration — Attention seeking behavior — Persistent tiredness — Lying

Sexual Abuse

Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts such as kissing, rubbing and touching inside or outside of clothing. They may include non-contact activities, such as voyeurism, involving children in the production or viewing of pornographic material, encouraging children to behave in sexually inappropriate ways, or performing sexual acts in their presence. For our policy it includes the grooming of children in preparation for abuse, including on the Internet.

Signs of sexual abuse that may or may not be present: — Pain or irritation to the genital area — Discharge from genitals — Difficulty with urination — Infection, bleeding — Sexually Transmitted Diseases — Fear of people or places — Aggression — Regressive behavior, bed wetting or stranger anxiety — Excessive masturbation/Sexually provocative — Stomach pains or discomfort walking or sitting — Being unusually quiet and withdrawn or unusually aggressive — Sleep disruptions, nightmares — Attention deficits — Suffering from what seem to be physical ailments that can't be explained medically — Showing fear or distrust of a particular adult — Mentioning receiving special attention from an adult or a new "secret" friendship with an adult or young person — Refusal to continue with school or usual social activities — Age inappropriate sexualized behavior or language

Sexual Harassment

Sexual harassment can include, but is not limited to: an unwanted physical advance or verbal approach of a sexual nature; Subtle or overt pressure for sexual involvement; Unwanted reference to one's physical appearance, sexuality or to sexual activities; unwanted physical contact; The demand for sexual favors accompanied by implicit or explicit threats against one's security or success; Any comments or actions which denigrate a person based upon gender; Unsolicited sexual gestures or comments or the display of offensive, sexually graphic materials. The school recognizes that not every advance of a sexual nature can be regarded as Sexual Harassment. (TCFL, 2019) Signs of sexual harassment that may or may not be present: — Receiving unwanted sexual notes or advances — Grabbing of body parts — Being victim of sexual rumors — Fear or refusal to wear certain clothes — Bullying for being a part of the LBGTQ+ community — Suffering from changes in emotional well-being — Fear of people or places — Abuse of drugs and alcohol — Receiving unwanted sexual jokes, gestures or comments.

Sexual Exploitation

It is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. It can also occur when children and/or adolescents are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online.

Signs of sexual exploitation that may or may not be present: — Signs of sexual abuse — Unexplained gifts or new possessions — Associate with other young people involved in exploitation — Have older boyfriends or girlfriends — Suffer from sexually transmitted infections or become pregnant — Suffer from changes in emotional well-being — Fear of people or places — Abuse drugs and alcohol — Go missing for periods of time or regularly come home late — Regularly miss school or education or go missing from education.

Online Sexual Abuse & Exploitation

Is the sexual abuse of children using digital technology. This commonly includes grooming children with a sexual motive, creating, viewing and distributing child sexual abuse material (child pornography and self-produced sexual images or 'sexts')

and coercing and blackmailing children for sexual purposes. This abuse may be perpetrated by individuals or groups of individuals, young people or adults and may include in-person contact or only online contact. As technology advances, new forms of this crime emerge. Children with unsupervised use and/or high usage of on-line platforms, low digital knowledge, low self-esteem, or poor digital literacy skills (sharing of passwords, insufficient privacy settings, etc.) may be especially vulnerable, but any child with digital access, boys or girls, may be victimized. Signs of online abuse or exploitation that may or may not be present: — Secretive behavior — Unexplained gifts or new possessions — Late night or excessive internet use — Anxiety — Withdrawal from family/friends/interests — Suicide ideation/self-harm — Poor educational achievement, attention deficits — Sleep disruption — Increase in followers or contacts — New devices and/or platforms — New usage patterns — Avoidance of online use or certain online platforms or apps.

Peer on Peer Abuse

Is generally referred to as peer on peer/child on child abuse and can happen both inside and outside of school/college and online. It is most likely to include, but may not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers; physical abuse; sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment; non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent; up-skirting (taking pictures under a person's clothing without permission to see their genitals, cause humiliation or for self gratification; and initiation/hazing type violence and rituals.

Bullying is defined as a constant and intentional aggressive behavior from one person to another that causes harm or discomfort. Bullying often implies an unbalance in power between victim(s) and aggressor(s). (APA, 2004).

Signs of peer on peer abuse that may or may not be present: — Absence from school or disengagement from school activities — Physical injuries — Mental or emotional health issues — Becoming withdrawn — Lack of self-esteem — Sleep disruption — Alcohol and substance misuse — Inappropriate behavior for age — Becoming harmful towards others. (International Centre for Missing & Exploited Children, 2020)

At TCFL we acknowledge that all types of abuse may or may not be present at any stage of our students' development and be concurrent with each other. These forms of maltreatment can occur inside or outside the family household, at school, in a community setting or online. They can be inflicted by the child's caregivers, close relatives or friends, or by strangers; by people at least five years of age older than

them or adults. Commonly, the abuse is perpetrated by a person the child knows and trusts, thus the low rate of self reports.

We understand that the long exposure to any of these forms of abuse by any child is considered an Adverse Childhood Experience (ACE) that can lead to severe trauma and other long term negative mental and physical health conditions as well as poor educational and socioeconomic development. (Nurius et al, 2015).

MANDATORY REPORTING

The TCFL Child Protection Policy establishes that all adults who are active members of the TCFL community are mandated to report any case of suspicion of abuse of a child. An active member of the community includes teachers, coaches, psychologists, counselors, directors, administrative and volunteer staff. Students and parents are also encouraged to report as well.

This reporting is regulated by the corresponding authorities and laws mentioned in the purpose and aim section. Failing to report any case of suspicion of or abuse that can harm a child or affect their development can be detrimental to their health and have severe consequences.

All mandatory reporters must report to their respective psychologist as soon as they hear, see or suspect any risk or abuse a child might be suffering from. If the reporter is not sure if they should report or not, they must confirm with the psychologist. The psychologist will then make sure the case is handled appropriately and is also required by law to report to the authorities if reasonable cause to do so is found.

CHILD PROTECTION TEAM

All staff members have the responsibility of following the mandatory reporting procedures established by this policy as well as maintaining a safe and supporting environment for all children and adolescents.

Roles and responsibilities

Within the school organization there are specific people responsible for responding to those concerns in accordance with our child protection procedures.

The child protection team includes the head of school, the principals, the school counselors/psychologists and the school doctor.

Safeguarding Trustee

The Head of School is responsible for:

- Assuring the proper implementation of this policy.
- Reviewing all cases reported.
- Making sure that cases are referred to external agencies, when the evidence suggests it.
- Ensure legal and ethical responsibilities are met
- Keeping an active role in all child protection meetings.

Strategic Safeguarding Lead

The principals are the ones in charge of:

- Reviewing the Child Protection Policy.
- Make sure safeguarding policies are followed
- Ensure staff receive training
- Ensuring and coordinating the proper implementation and development.
- Keeping an active role in all child protection meetings
- Lead the school's response to serious concerns.

Designated Safeguarding Lead (DSL)

The role of the psychology team is:

- Handling all the reports of concern and notifying the child protection team.
- Implementing the inquiry process and determining the course of action to support student safety.
- Leading the informational sessions and training about the child protection policy for parents and TCFL members.
- Providing the appropriate resources and support to students, families and the TCFL community.
- Following up with all reported cases.

The role of the school doctor is to:

- Apply clinical knowledge to identify possible signs of child abuse and neglect and make the appropriate referrals and reports.

CASE MANAGEMENT PROCEDURE

All TCFL members are required to know and understand these case management procedures in the event that they witness or become aware of any form of student abuse or maltreatment. It is expected that they will act with confidentiality, be empathetic and kind, avoid over-interrogating, and take detailed notes.

The steps for managing suspected cases of child abuse or neglect are the following:

1. Reporting
2. Information gathering
3. Intervention plan
4. Follow-up

STEP 1: Reporting

Any TCFL member that suspects, observes, or receives a report that suggests any form of abuse must immediately notify the corresponding school counselor by requesting a meeting and completing the concern form provided in this document.

STEP 2: Information gathering

The school counselor, through observation of the student behavior, counseling, and in consultation with the school doctor if necessary, will investigate the facts regarding the reported incident in order to determine if there is reasonable cause to proceed.

If there is reason to proceed, the school counselor must take the evidence gathered to the Head of School, who is in charge of reviewing all the reported cases, and inform the necessary members of the Child Protection Team and create a school-based response.

STEP 3: Intervention

The Child protection team will determine the need to initiate the development of a safety plan to support the children and the families affected. Depending on each particular case, the plan can include:

- Meeting with the student to assess risk factors, signs and other elements related to the abuse.
- Meetings with the family to present the school's concerns. Counseling sessions by the school counselor with the student. In-class observations of the child made by the teacher, counselor, or principal.
- Creating a safety plan with the student (including but not limited to removing themselves from the abusive context or relationship, safety escape routes and emergency contacts)
- Referral of the student and family to external professionals - psychologists, doctors and/or others.

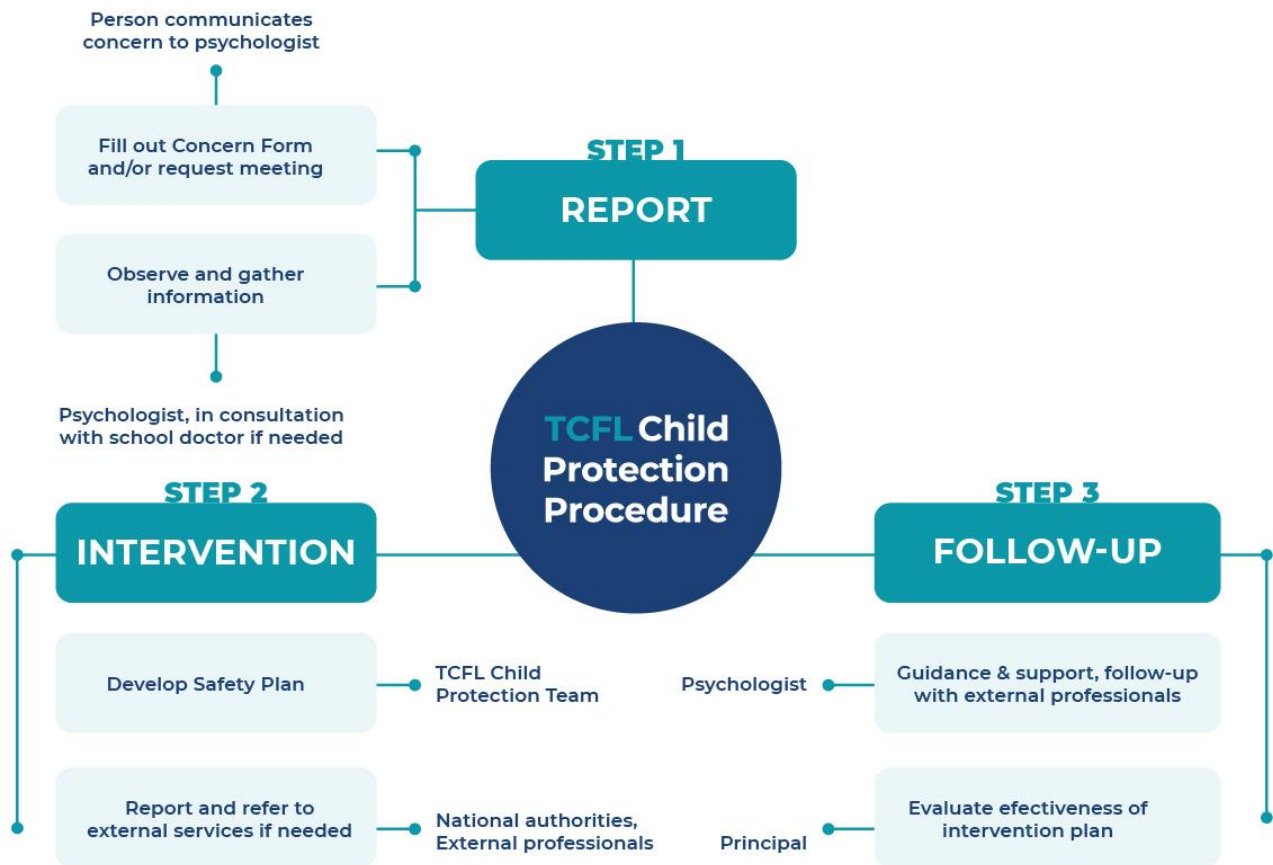
All serious allegations will involve reporting to the following authorities for further investigation and actions:

- Consultation with the school's attorney or another attorney.
- Unidad de Prevención y Persecución de Violencia de Género, Intrafamiliar y Delito Sexual del Distrito Nacional - Fiscalía del Distrito Nacional (809-533-6668)
- Consejo Nacional para la Niñez y la Adolescencia, CONANI (809-567- 2233)
- Línea Vida (809-200-1202)

STEP 4: Follow-up

The school counselor will sporadically follow up and continue to provide guidance and support to the child, the family and the teachers, providing relevant resources, information and strategies. Also, the counselor will maintain contact with outside therapists and/or other professionals to follow up with the child's progress.

TCFL CHILD PROTECTION PROCEDURE



Documentation

All documentation gathered in the process and notes will be kept in the child's school confidential records. In the case that the allegation involves a TCFL member, the report should be made to the Head of School, so a particular confidential investigation can be done.

TRAINING

All TCFL members will receive appropriate training on child safeguarding:

New teachers will undergo formal training at the start of the school year, and returning teachers will receive a yearly refresher during the academic year. All staff members are obligated to read our child protection policy manual, and to understand how to report concerns and all the related procedures.

Parents will be provided with all the information regarding the TCFL Child Protection Policy and procedures, and have access to it via our website. Also they will be part of regular meetings and workshops regarding child safety and policy updates.

Students will be provided with workshops and opportunities to learn about safeguarding, including keeping themselves safe online. They will be familiarized with all the school's resources available for them.

Training process

Member	Training/Information	Frequency
Teacher, Assistants, General and Administrative staff	Mandatory training in all aspects related to this policy, including reporting and intervention procedures.	Beginning of their contract
Parents	Optional Informational sessions covering the general aspects of the policy and the school's reporting responsibilities.	When the policy is first implemented Every school year, twice a year
Students	Mandatory informational sessions about this policy, ways for self reporting and resources available to them at school. Workshops and curriculum that covers areas of prevention and awareness in mental, sexual and development health and online safety.	Every school year Throughout the school year
General Public	Information available in our website and in our Open House events	

RECRUITMENT

The school has the responsibility to make sure that all of their employees are suitable to work with children. During the recruitment process the school will make sure to receive and keep the following records:

- Full CV
- Reference checks
- Police clearance certificate
- Signed "Acknowledgement of Code of Conduct"
- As part of their orientation, every new employee will receive a child safeguarding training.

CONCERN FORMS

[Concern form TCFL parents- English](#)

[Concern form for parents -Spanish](#)

[Concern form TCFL staff -English](#)

[Concern form TCFL staff -Spanish](#)

TCFL CODE OF CONDUCT

The Community for Learning is committed to the safety and protection of children. This Code of Conduct applies to all faculty, staff, employees, volunteers and everyone who represents the school and who interact with children or young people in both a direct and/or indirect way.

We must, at all times, be aware of the responsibilities that accompany our work. We should be aware of our own and other persons' vulnerability, especially when working alone with children and youth, and be particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries in such interactions.

We must show prudent discretion before touching another person, especially children and youth, and be aware of how physical touch will be perceived or received, and whether it would be an appropriate expression of greeting, care, concern, or celebration.

We must intervene when there is evidence of, or there is reasonable cause to suspect, that children are being abused in any way. Suspected abuse or neglect must be reported to the appropriate school staff described in the Child Protection Policy of the school.

As a member of TCFL staff, I understand that it is my responsibility to act appropriately and according to the statements provided in this code of conduct.

I commit to:

- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Provide a welcoming, inclusive and safe environment for all children and young people regardless of their age, gender identity, sexual orientation, ability, religion, nationality & culture.
- Maintain appropriate physical boundaries at all times and touch children – when necessary – only in ways that are appropriate, public, and non-sexual.
- Encourage open communication between all children, young people and adults and have children and young people participate in the decisions that directly impact their emotional, physical and academic wellbeing.

- Implement the following steps in order to reduce the risk of inappropriate communication between TCFL personnel and minors:
 - Email exchanges between a minor and a person acting on behalf of the school are to be made using a school email address.
 - Electronic communication that takes place over a school network or platform may be subject to periodic monitoring.
 - Faculty, staff, and volunteers who use any form of online communications including social media (Instagram, Facebook, X-former Twitter, Tik Tok, etc.) and text messaging to communicate with minors may only do so for activities involving school business.
- Exercise due care in all matters related to my role with a child or young person, and I will disclose confidential information only with the designated child protection team.
- Refrain from the illegal possession or use of drugs at all times, and refrain from the use of tobacco products and alcohol when working with children. Adults should never buy alcohol, drugs, cigarettes, videos, or reading material that is inappropriate and give it to young people.
- Have discussions about students (both positive and negative, formal and informal) in private spaces within school premises.
- Comply with the mandatory reporting regulations of TCFL and with the TCFL policy to report suspected child abuse.

I will NOT:

- Engage in behavior that is intended to shame, humiliate, belittle or degrade children.
- Use inappropriate, offensive or discriminatory language when speaking with, in front of, or about a child or young person.
- Touch or speak to a child and/or youth in a sexual or other inappropriate manner.
- Inflict any physical or emotional abuse such as striking, spanking, shaking, slapping, humiliating, ridiculing, threatening, or degrading children and/or youth.
- Develop a sexual relationship with a child or any relationship with a child or young person that may be deemed inappropriate, exploitive or abusive.
- Smoke or use tobacco products, or possess, or be under the influence of alcohol or illegal drugs at any time while working with children and/or youth.
- Give a child who is not my own a ride home alone without the knowledge of their parents or guardians.

- Condone or participate in behavior with children that is illegal, unsafe or abusive.
- Engage in private communications with children via text messaging, email, Facebook, X-former Twitter, Tik Tok or similar forms of electronic or social media except for activities strictly involving school business.
- Use inappropriate vocabulary or make inappropriate comments in the presence of children and/or youth at any time.
- Publish a photo or video of a child or young person on social media and/or send a picture to any person outside of the school staff.

I understand that as a person working with and/or providing services to children and youth at TCFL I am subject to a criminal history background check.

My signature confirms that I have read and agree to the terms detailed in this document and that as a person working with children and youth I agree to follow these standards. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary and/or legal action up to and including removal from TCFL.

Name

Signature

REFERENCES

American Psychological Association. (2004, July). APA Resolution on Bullying Among Children and Youth. APA.ORG <https://www.apa.org/about/policy/bullying.pdf>

Escola Americana de Campina. (n.d.) EAC child protection handbook. ICMEC.ORG. Retrieved December 15, 2020 from, https://www.icmec.org/wp-content/uploads/2018/07/Child_Protection_Guide-EAC.pdf

International Centre for Missing & Exploited Children. (2020, June). Definitions, signs and indicators of abuse. CDN.ICMEC.ORG https://cdn.icmec.org/wp-content/uploads/2020/06/Forms-of-abuse-definitions-signs-and-indicators.pdf?_ga=2.184541474.568477544.1592837044-1897028981.1543776744&_gac=1.49408914.1592943361.EAlalQobChMI077ytuCY6glVmZOzCh2qIQldEAAYASAAEgLoy_D_BwE

National Society for the Prevention of Cruelty to Children (2023). Grooming.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming/#types>

Nurius, Paula. Green, Sara. Logan-Green, Patricia (2015). Life course pathways of adverse childhood experiences toward adult psychological well-being: A stress process analysis.

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4470711/#_ffn_sectitle

UK department of education. (2021, September). Keeping Children Safe in Education 2021. Assets.publishing.service

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014058/KCSIE_2021_Part_One_September.pdf