

# NICS/Oasis Child Safety Policy and Procedures

## Introduction

The Network of International Christian Schools / Oasis International Schools (NICS/Oasis) takes its responsibility to protect and nurture children seriously, creating a safe and positive environment in which to grow. The protection of children is the responsibility of every adult within NICS/Oasis. We expect staff to conduct themselves with utmost integrity and professionalism at all times. Working together we can create a safe, positive, and nurturing environment for children, protecting and safeguarding them to the highest standards possible. Supportive nurture is always to be guided by biblical standards of morality, ethics, and prudence. There is no intent, in any way, to usurp a parents' role as primary caregiver and guardian of their children. However, the responsibility of the parent, as well as the organization, is to provide a safe and secure environment for all children in our care.

As an organization NICS/Oasis is committed to:

- Valuing children and ensuring their safety in all locations and facilities where we are responsible to care for them
- Encouraging and supporting parents
- Ensuring that all staff involved with children are given support and training in child safety and protection
- Complying with legal requirements in reporting as necessary

NICS/Oasis expects proper moral and ethical conduct toward all children who are in the care of NICS/Oasis whether on NICS/Oasis property, at a NICS/Oasis school, under the care of NICS/Oasis staff, or attending a NICS/Oasis function. This expectation applies to all staff (expatriate and local), volunteers (regardless of their length of service), employees, associates seconded to NICS/Oasis and partner organization staff working with NICS/Oasis. It also applies to any visitors at any school campus. Adult staff and volunteers assume the responsibilities of setting and maintaining clear, appropriate boundaries in all interaction with children. This extends to extra-curricular activities where staff members and volunteers continue to represent the confidence placed in them by NICS/Oasis in areas of Christian integrity and in their responsibility to uphold standards of safety and accountability in their interactions with children.

NICS/Oasis is a member of the Child Safety & Protection Network (CSPN). NICS/Oasis' child safety policies and procedures are consistent with the recognized elements of an organizationally mature child safety program adopted by CSPN<sup>1</sup>.

## Definitions of Abuse

Child abuse is the ill treatment of a child<sup>2</sup> by a parent, caregiver, someone living in his/her home or anyone who works with or around children in the context of a relationship of responsibility, trust, or power. Abuse of a child is any action (or lack of action) that causes injury or endangers or impairs a child's physical, mental, or emotional health and development.

### A. Types of Abuse

#### Sexual Abuse

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

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

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<sup>1</sup> The **Child Safety & Protection Network** was formed in 2006. It is a network of like-minded organizations formed to develop common protocols in child safety. This network has developed a common set of recognized child safety elements which includes written policies and procedures, child abuse definitions, screening, a code of conduct for adult interactions with children, training of adults and children in child safety, childcare guidelines, child abuse response protocols, and counseling and member care.

<sup>2</sup> The common legal definition of a **child** is anyone under the age of 18. NICS/Oasis considers any student enrolled at a NICS/Oasis school to also be included in this definition and fall under the protection of these policies, even those who may be 18 or older.

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

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

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

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

showing of pornographic material, or the showing of any human sexual activity or simulated sexual activity.

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

## **Physical Abuse**

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

Although discipline should be instructive rather than punitive, occasionally there could be a fine line between parental disciplinary practices and physical abuse. NICS/Oasis will not interfere with parental disciplinary matters unless an incident of abuse is clearly suspected or observed or unless there is a pattern of abusive behavior on the part of one or both parents. NICS/Oasis has defined a pattern of behavior as three (3) incidents or occurrences.

## **Emotional Abuse**

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

Acts of Omission (or "what is not done"): Omission includes the failure to provide a developmentally appropriate and supportive environment, including the availability of a primary attachment figure so that the child can develop a stable and full range of emotional and social competencies commensurate with his or her individual potentials, and in the context of the society in which the child dwells. Behaviors that fall under omission include, but are not limited to, not expressing or showing love and affection, and prolonged isolation from the child's parent or caregiver.

Acts of Commission (or "what is done"): This includes acts toward the child that cause or have a high probability of causing harm to the child's health or mental, moral, or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Such acts include restriction of movement, patterns of belittling, denigrating, scapegoating,

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

threatening, humiliating, screaming, blaming, sarcasm, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.

## **Neglect**

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

Neglect also includes depriving a child of their basic needs of food, clothing, warmth and shelter, emotional and physical security and protection, medical and dental care, cleanliness, education, and supervision.

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

## **B. Inappropriate Behavior**

### **Inappropriate Behavior by an Adult**

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

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

### **Child-to-Child Inappropriate Behavior**

Should both the victim of an alleged abuse and the alleged offender be a child, it will typically be considered abuse only if there is more than three years age difference between the children. If there is less than three years age difference, what would normally be defined as abuse may be considered as inappropriate behavior, with an action plan put in place to address the behaviors of concern and their effects. Other factors considered in evaluating whether abuse has occurred include the following: differences in responsibility, trust, power, development, awareness and understanding, coercion, and threats, whether implied or verbal. There is a difference between normal childhood sexual exploration and inappropriate sexual behavior or abuse. Typically, sexual abuse between individuals under the age of 18 is defined as any sexual behavior

that occurs without consent or understanding by one party, without equality, or because of coercion.

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

## C. Local Legal and Cultural Factors

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

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

The director of each school (and/or a designated school employee) is responsible to proactively investigate and know the civil and/or criminal laws that may apply to child safety and protection issues in each school’s host country.

## Screening

In addition to the written application questions completed by all NICS missionaries and NICS Associate/Locally Hired Personnel, the basic screening done by Placement Specialists, the reference forms completed by the applicant’s references, and the personal interview conducted by school administrators, the Mobilization Department at the NICS/Oasis Home Office conducts a criminal background search using a third-party firm.

- A. The written application contains questions regarding the following:
  - 1. Specific employment history and/or work with children
  - 2. Questions related to inappropriate behavior or abuse of children

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

- B. Placement Specialists review all applicants' paperwork and follow up with applicants regarding any questions or clarification needed before presenting a candidate to a school administrator for a personal interview.
- C. All applicants identify three (3) references who are asked to complete a confidential reference form on the applicant. Completed reference forms are requested from a professional/employment related reference, a pastoral reference, and a personal reference. These references are also asked to provide the names of two (2) individuals who may be able to provide a reference. The reference form asks specific questions about the applicant's involvement with children.
- D. The school director does a personal interview with all applicants before offering a position. The director has the prerogative to ask specific questions about the applicant's interaction with children beyond what is provided on the application forms.
- E. The NICS/Oasis Home Office Mobilization Department requests a criminal background check on all new hires once the new hire completes the appropriate release form. Individuals are not allowed to serve with the organization until the background check is completed and verified as clear of any misconduct.
- F. Where possible and permissible in the host country, the school director is responsible to obtain a criminal background check on all national/local staff hired by the school, as well as volunteer personnel.

## **Training**

### **A. Training of Adults in Child Safety**

#### **Initial Training**

NICS/Oasis shall provide training in child protection policy and procedures to all those in active service within the organization, no matter what their official category. This includes all employed staff (expatriate and local), volunteers (regardless of the amount of volunteer time) and staff seconded to NICS/Oasis from other organizations.

This training can be accomplished in various ways, e.g. in person, through video, or on-line using materials approved by NICS/Oasis. Initial training for NICS appointed staff members will happen during IMPACT (the agency's pre-field training program). Staff members hired too late to attend IMPACT must be trained once they arrive on the field. The school director is responsible for the training of all Locally Hired Personnel (LHP) before they begin service at the school.

Key aspects of the training program include:

1. Raising awareness and presenting data regarding the reality of and occurrence of child abuse in the school setting.
2. Recognizing the types of abuse, how abuse occurs, its behavioral and emotional indicators in children, as well as red flags identified for a potential offender.
3. NICS/Oasis standards of conduct for adults regarding interaction with children.
4. Identifying and preventing abuse between children.
5. NICS/Oasis policies and procedures for both prevention of and response to abuse or neglect or suspicion of abuse or neglect.
6. Cultural factors in the home culture, organizational culture, host culture, and on multi-cultural teams. Cultural and world-view issues unique to the location of the ministry and cultural sensitivities of appropriate behavior. Differences between what is acceptable behavior locally and what is acceptable behavior under NICS/Oasis child protection policy.

### **Ongoing Training**

Every school director is responsible to ensure that ongoing training occurs in each school. Ongoing training for all NICS/Oasis staff will be provided and will include:<sup>9</sup>

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

## **B. Training of children and parents in child safety**

Every NICS/Oasis school will teach a child safety unit annually to all children. This training will include information on where to go for help related to inappropriate behavior, abuse, and harassment. NICS/Oasis schools will provide information on the training of children to their parents. Additionally, schools are to have basic child safety training available to school parents who choose to participate.

## **C. Symptoms of Abuse or Neglect**

Adults should be alert to the physical signs of abuse or neglect, as well as to behavioral and verbal signs a victim might exhibit. A one-time event would not necessarily constitute a potential abuse case; however, sudden unexplained physical or behavioral

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<sup>9</sup> The exact frequency and scope of the ongoing training is still in development.

changes, particularly by children visiting other children in their homes, would warrant some investigation.

### **Physical signs may include**

- Lacerations and bruises
- Nightmares
- Irritation, pain or injury to the genital area
- Difficulty with urination
- Discomfort when sitting
- Torn or bloody underclothing

### **Behavioral signs may include**

- Unexplained anxiety when approaching a specific location
- Nervous or hostile behavior toward adults
- Sexual self-consciousness
- “Acting out” sexual behavior
- Withdrawal from usual activities and friends
- Depression
- Self-destructive or aggressive behavior

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

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

## **Code of Conduct for Child Safety<sup>10</sup>**

### **1. Visibility**

Risk decreases as visibility increases. *I will plan my work and interaction with children in a way that increases visibility by others as much as possible.*

### **2. Overcoming Isolation**

Risk decreases as isolation decreases. *I will reduce isolation in my interactions with children as much as possible by keeping others informed of or observant of these interactions.*

### **3. Accountability**

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<sup>10</sup> The **Code of Conduct** is duplicated in the *NICS/Oasis Child Safety and Protection Code of Conduct* which all employees and volunteers must sign.

Risk decreases as accountability increases. *I will interact with children in a mature, capable, safe, caring, and responsible manner with a high level of accountability. I will give and accept feedback from others in order to maintain a high level of professionalism and integrity in interactions with children.*

#### **4. Supervision**

Risk decreases as supervision increases. *I will welcome supervision and observation of my interactions with children at any time and place.*

#### **5. Parent Involvement**

Risk decreases as parental involvement increases. *Because parents are ultimately responsible for the care of their children, I will welcome parental involvement at appropriate times and settings.*

#### **6. Discipline**

Proper discipline reduces risk. *I agree that discipline is best viewed as instructive and corrective and will exercise discipline with my students in a way that is reasonable and healthy.*

#### **7. Touch**

Healthy, caring touch is valuable to children, but unhealthy touch is abusive. *I agree that healthy touch should be open, age-appropriate, responsive to the need of the child, and respectful of the child's wishes. I also agree that any touch that could be perceived as sexual in nature is inappropriate and that I will not engage in it.*

#### **8. Verbal Interaction**

Words can be used to support and encourage a child, but words used in a wrong way can be destructive. *I will use my words to encourage and edify children, and not to demean or damage them in any way.*

#### **9. Child-to-Child Behavior**

Positive child-to-child interaction is essential for healthy development. *I will, along with members of my team, monitor child-to-child interactions for inappropriate or abusive behavior or neglect.*

#### **10. Responsibility**

Acceptance of reporting responsibility decreases risk. *I understand and agree that I am responsible to report (as soon as possible and within 24 hours) to my supervisor/director any actual or reasonably suspected abuse or neglect of any child by anyone regardless of where it may have occurred. I will not attempt to handle the situation privately or enter into any private agreement with the offending or accused individual or reporting person.*

# Reporting and Response Protocol

NICS/Oasis will respond to all reports/allegations of child abuse or neglect regarding any employee or volunteer involving any child in a NICS/Oasis school. NICS/Oasis will respond regardless of the perceived validity or severity and to current or historical reports/allegations.

## A. Reporting Process

A child's report of abuse may be direct or indirect, or an adult may notice signs of abuse or neglect. When any adult in the community has reasonable suspicion<sup>11</sup>, observes, is given a report of child abuse, or has knowledge which gives reason to suspect child abuse or neglect, he or she has two responsibilities:

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

When a child reports abuse to any adult, that adult's first and primary responsibility is to listen with compassion and care, without any attempt to evaluate the credibility of the report at this point.

The following responses are important to convey to the child:

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

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

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

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

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<sup>11</sup> **Reasonable suspicion** is defined as being objectively reasonable for a person to entertain a suspicion, based on facts that could cause a reasonable person, drawing on his/her training and experience (when appropriate) to suspect child abuse or neglect.

Mistakes to avoid include:

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

## 2. Make the Initial Report to Authorities

Following the initial care given to the child, the adult’s second duty is to inform the school director (or his/her designee) immediately (or in cases involving the school director, make the initial report to the NICS/Oasis Child Safety Officer).

The initial report should be made immediately without taking any other action or doing any preliminary investigation. This should be done, preferably, by in-person contact, but, if that is not possible, by telephone conversation or e-mail. Use the *NICS/Oasis Initial Report Form for Suspected Inappropriate Behavior or Abuse* (hereinafter referred to as “**Report Form**”) to put whatever was learned in writing as soon as possible so that it is remembered fully and accurately.

The reporting duties are individual and no supervisor, administrator, or board member may impede or inhibit the reporting duties. No person making a report will be subject to any sanction by NICS/Oasis for making a reasonable report.

Reporting the information regarding a case of possible child abuse or neglect to another staff member, volunteer, or person other than the school director (or the NICS/Oasis Child Safety Officer if the school director is accused of abuse) breaks agency procedure and will not be a substitute for making the mandated report to the school director (or the NICS/Oasis Child Safety Officer).

Several principles guide this process:

- All situations must be reported, regardless of the perceived severity or validity, including both those reports initiated by adults and those initiated by children. It is often incorrectly assumed that incidents between same or similar aged children can be handled between the families if the children are repentant and show no signs of being affected. If the children involved do not get appropriate

counseling, there is a significant percentage of individuals who repeat the behavior with other children.

- There is no statute of limitations on internal investigations. Some legal systems make provision for a statute of limitations on investigating abuse incidents, allowing offenders to avoid prosecution if a certain amount of time has passed since the offense was committed. NICS/Oasis will, however, respond to reports of abuse, no matter how old, because of the importance to the victim, other children, and the organization itself.
- NICS/Oasis assists victims who are reluctant to report. Because of the danger offenders pose and the importance we place on the care and protection of the children entrusted to us, the organization will take responsibility for investigating reports of child abuse, rather than expecting parents of children who are victims to pursue claims independently. When victims or their parents are reluctant due to fear of reprisal, lack of understanding of other potential victims, or lack of current symptoms, NICS/Oasis will seek to provide support, education, and care to them while moving forward with the reporting process.
- NICS/Oasis will become involved in any abuse accusation concerning a NICS/Oasis student, parent, employee, volunteer, or other person with a direct connection to a NICS/Oasis school whether or not the incident occurred on the property/facility of a NICS/Oasis school or was a school sponsored event.

### 3. Confidentiality

Confidentiality is critical both to protect the victim and the accused from further harm through exposure and to preserve the integrity of the process. NICS/Oasis expects that a “need to know” policy will be strictly adhered to throughout the reporting process. Thus, the individual receiving the report is to not widen the circle of “need to know” people beyond the school director. Once reported, the school director (or designee) may use discretion as to who is in the “need to know” group (school counselor, nurse, chaplain, etc. as appropriate).

### 4. Initial Response to the Reported Abuse or Neglect

When the school director (or designee) receives such a report, he/she initiates the following procedure:

- a) Receive the report and complete the *Report Form* (if not already completed by initial reporter).

The school director will confer with the individual reporting the incident as soon as possible and explain NICS/Oasis’ procedures for responding to the incident.

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

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

The school director (or designee) is to communicate the report directly to NICS/Oasis Child Safety Officer without trying to handle it on the local level. Because abuse of children has such a huge impact on the lives of those involved, and others in the school community, NICS/Oasis recognizes the importance of a diligent and consistent response to reports.

When completing the **Report Form**, care should be taken to ensure that the report contains only those facts that are known at the time and is based only on the information given by the reporter and any additional information known without any further questioning of the victim. No additional interviews or investigation should take place at this point.

If the school director becomes aware of any complicating factors, or there is a need to alter procedures, the school director is to contact the NICS/Oasis Child Safety Officer for advice and assistance.

**Note:** If the person involved in the report either as an alleged offender or alleged victim is a member of another mission agency, then that entity’s child safety director should be informed of the initial report. This may lead to cooperation and engagement with that agency during the investigative process.

- b) Contact the NICS/Oasis Child Safety Officer concerning the matter as soon as possible and within 24 hours and e-mail to him the completed **NICS/Oasis Report Form**. If the NICS/Oasis Child Safety Officer is unavailable or out of the office, the report must be sent to the NICS/Oasis Director of Academic Development (DAD) for follow-up. The same 24-hour reporting requirement must be used when contacting the DAD.

Contact information for all NICS/Oasis Home Office personnel is available at each NICS/Oasis school.

- c) Provide Care and Protection for the Victim.

The school director is responsible to ensure that the child is safe. This involves ensuring the alleged offender has no further access to or contact with the child.

It also may involve changing the environment to provide a renewed sense of safety or moving the child and their family to a safer location.

d) Get the Child any Needed Medical Attention.

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

Schools are responsible to determine where medical facilities are available within close proximity that employ medical staff trained to do rape assessments.

## **5. Reporting Allegations to Appropriate Authorities**

a) Cases Occurring in the United States

In cases of suspected child abuse occurring in the United States, NICS/Oasis will report the abuse allegation to the appropriate authorities in a timely manner as required by laws in that local jurisdiction. The controlling factor is whether the responsible person, or caregiver, has knowledge or reasonable cause to suspect that child abuse may have occurred.

b) Cases Occurring outside the United States

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

c) Cases Occurring outside the United States when the offender returns to the United States

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

## **B. Initial Assessment (Inquiry) Procedures**

### **1. General Information**

After receiving a child abuse or neglect report from a school director (or other school personnel), the NICS/Oasis Child Safety Officer will review the report and determine the extent of any inquiry to be conducted. Every report will be examined objectively. NICS/Oasis will default to any requirements of and involvement from local authorities within the scope of their jurisdiction. When child abuse laws are non-existent or local authorities take no jurisdiction, NICS/Oasis' internal policies will be the controlling factors. Any initial assessment must never impede an ongoing criminal investigation.

### **2. Initial Assessment**

If it is determined by the NICS/Oasis Child Safety Officer, in consultation with the school director (or other school personnel if the school director is the accused person), that the allegation warrants an initial assessment, one will be conducted.

- a) Any initial assessment will be guided by two parameters:
  - 1) All NICS/Oasis personnel involved in an assessment will operate within a climate of belief, meaning that the abuse *could* have taken place.
  - 2) All NICS Oasis personnel involved in an assessment will take a neutral stance toward the innocence or responsibility of the alleged offender until the assessment process is conducted and appropriate conclusions reached.
- b) An initial assessment team will be formed by choosing two or three (2 or 3) persons from among respected adults in the school community. Preferred team members will be NICS/Oasis personnel serving in that school, but other respected adults in the community will be called upon if necessary. The decision concerning the make-up of the team will be made jointly by the school director and the NICS/Oasis Child Safety Officer.
- c) No one person should ever act alone in assessing an allegation of child abuse or neglect. No interview should ever be conducted by only one person. Any interview with a child should include at least one person of the child's gender wherever possible. If there is a lack of available personnel, it is more important to have an experienced interviewer than one who is the right gender.
- d) Following all NICS/Oasis policies relating to child protection, the initial assessment team will thoroughly review the initial report, and assess the reliability of the reporter and the credibility of the report.
- e) The initial assessment team will notify parents if they are not already involved.
- f) The alleged offender is NOT to be advised of the allegations at this time.

- g) The team will interview the victim's parents and the victim (or victims).
- h) If possible, the team will interview a limited number of collateral witnesses who can speak to the reliability of reporter and/or the credibility of the report. This should be carried out with caution and strong justification while holding up the principle of confidentiality.
- i) The team will record all impressions, concerns and observations factually, giving time and date. Written records are to be kept confidential and secure.
- j) An Outcome Decision will be prepared by the initial assessment team. This Outcome Decision will include information from the initial report, information gathered, and conclusions reached. If applicable, it will also include an action plan to address any issues raised during the assessment.
- k) If the initial assessment team concludes that the matter warrants no further action, the file will be closed. The report and all related materials will be kept in a confidential file by the NICS/Oasis Child Safety Officer.
- l) If the initial assessment team concludes that the initial report is credible and reliable, a Child Safety Assessment (and possible Misconduct Assessment) will take place.

### 3. **Child Safety Assessment (and possible Misconduct Assessment)**

#### a) Child Safety Assessment Team

All NICS/Oasis Child Safety Assessment team members conducting a Child Safety Assessment must meet certain qualifications. Each team member must maintain confidentiality (and must have signed the *NICS/Oasis Child Safety Confidentiality Agreement*), have respect and credibility, must be empathetic but unbiased and impartial, understand the difference between interviewing and support/advocacy, and must be stable and mature. Each team member must have flexibility to set aside other responsibilities and respond quickly and fully on short notice, including travel when needed. It may be prudent to continue to use the existing Initial Assessment team.

- 1) The Child Safety Assessment team and team leader is selected by and reports to the NICS/Oasis Child Safety Officer. The Child Safety Assessment team is to be guided by NICS/Oasis policies and procedures for child safety and protection. The team leader is responsible for submitting the Outcome Decisions and eventual Statement(s) of Findings.
- 2) The Child Safety Assessment Team includes at least three (3) members representing both genders and, if possible, individuals of the same first language and/or culture of those involved.

- 3) One (1) or more team members may participate in team functions via *Skype* or other similar means, but at least two (2) team members should be in the location where the allegation occurred.
  - 4) An independent, outside observer must either be on the team or engaged afterward to review both the process and findings.
  - 5) At least one team member must be trained in Child Safety and Protection Network inquiry procedures.
  - 6) Team members located in different areas of the world may be utilized to conduct the needed interviews in various locations or team members may travel to conduct the interviews. At times, members may be needed who speak a specific language or have experience with cultural considerations that affect the case or have experience interviewing specific ages of children.
  - 7) When NICS/Oasis determines that an investigation goes beyond the expertise and experience of the Child Safety Assessment team or the complexity of the case, additional expertise may be sought.
- b) Costs of the Investigation

Should an abuse report lead to a Child Safety Assessment requiring travel, the NICS/Oasis member school will pay for all Child Safety Assessment team expenses, which includes such things as transportation to the community (international and local), travel insurance, and food and lodging associated with the Child Safety Assessment.

c) Child Safety Assessment and Misconduct Assessment Process

- 1) No steps in the Child Safety Assessment will take place until the team has arrived at the location.
- 2) The alleged offender is notified that a child abuse report has been received, the name of the individual or family involved, that a Child Safety Assessment is beginning, and that he/she will receive a version of the Statement of Findings when the inquiry is completed.
  - i. The alleged offender is to be placed on paid administrative leave during the process (if he/she is employed by the school) and will be prohibited from having contact with or access to the child(ren) involved in the inquiry.
  - ii. The team will insure that the alleged offender and his/her family have needed support and accountability.
- 3) The team reviews the initial report, all additional information gathered during the Initial Assessment, and any other relevant documents. From this

information (in addition to NICS/Oasis Child Safety and Protective Policy) the team develops a plan to conduct the inquiry.

- 4) The team conducts interviews with all those who may have relevant information. Standard interview formats are used for each type of interview (these may be found on the CSPN website ([www.cspn.org](http://www.cspn.org)). Those interviewed would include:
    - i. Victim (or victims)
    - ii. Victim's parents (separately and back-to-back)
    - iii. Alleged offender (and spouse if applicable)
    - iv. Known witnesses
    - v. Those persons who the victim and alleged offender indicate are witnesses or can contribute to the inquiry
  - 5) The team exercises due diligence to determine whether there are additional victims. If additional victims come to light, the team must provide support and safety for them.
  - 6) The team will record all impressions, concerns, and observations factually, giving time and date. All interviews will be documented using actual quotes as much as possible. Written records are to be kept confidential and secure by the NICS/Oasis Child Safety Officer.
- d) Preparation of Findings and Conclusions

NICS/Oasis will follow its written policies regarding possible outcomes, application of corrective actions based on those outcomes, and provision of accurate employment references to other organizations regarding offenders.

Once the inquiry is complete, the team will prepare a Statement of Findings. The Statement of Findings should include a description of the reported behaviors in the initial report, the inquiry process followed to respond to the report, the data collected, the conclusion reached, the administrative outcome (including any required responses), and any action plans (including a report to appropriate authorities, a safety plan, and follow-up counseling).

An appropriately edited copy of the Statement of Findings will be given to both the alleged offender and the victim (or victims) and/or the victim's parents and other appropriate stakeholders. A master copy is kept by the NICS/Oasis Child Safety Officer and the School Director.

If the Child Safety Assessment team concludes that the allegation is not supported, the file will be closed (pending discovery of further information).

The team will develop recommended action steps for:

- 1) The victim or victims
- 2) The offender (or alleged offender)
- 3) The family of each victim
- 4) The family of the offender
- 5) The affected school's administration (to trigger a review of school systems)

### **C. Possible Outcomes of a Child Safety Assessment and/or a Misconduct Assessment**

1. Apply NICS/Oasis child abuse policies

The victim's reliability has been sufficiently validated and the report sufficiently corroborated to conclude that the alleged offender violated NICS child safety policy.

2. Do not apply NICS/Oasis child abuse policies

NICS has determined that there is no substance to the allegations or has been unable to sufficiently validate the alleged victim's reliability and/or report for NICS to conclude that NICS child safety policies have been violated.

3. Inconclusive

The alleged victim's reliability has been sufficiently validated for us to conclude that the reported abuse did occur. There is not, however, sufficient corroborating information for NICS to conclude that the offender named in the alleged victim's report was the perpetrator.

4. Apply NICS/Oasis policies regarding inappropriate behavior but not child abuse

The alleged victim's reliability has been sufficiently validated and the report sufficiently corroborated to conclude that inappropriate behavior did occur, that, while serious in nature, does not meet NICS' definition of Child Sexual Abuse. NICS policies regarding this type of behavior shall be applied. This category is also typically utilized when the behavior occurs between two minors less than three years apart in age, and there is not significant threat or coercion.

5. Other

If a Child Safety Assessment leads to a finding that does not fit one of the previous four categories, it will fall in this category, and an appropriate description and explanation of the outcome shall be stated.

## **D. Administrative Actions**

1. Anyone who is known or determined to have committed sexual abuse of a child under the age of 18 at any time during his/her adult life is not eligible for service and, if serving, will have his/her relationship with NICS/Oasis terminated immediately, with no later opportunity to serve as a member, a volunteer, or an accompanying spouse, or be on school properties. There is no option of resignation. For those seconded from other sending organizations, NICS/Oasis will recommend that membership in their organization also be terminated.
2. Anyone who committed sexual abuse of a child before the age of 18 will be evaluated on a case-by-case basis, considering such factors as age, seriousness of the offense, acknowledgement of responsibility, and effective treatment.
3. Appropriate administrative actions, up to or including termination of relationship with NICS/Oasis will be taken for anyone who is known or determined to have committed physical or emotional abuse or neglect of a child. Mitigating circumstances may allow lesser responses than termination of relationship with NICS/Oasis. If the relationship is terminated, later reapplication and restoration to membership, in an assignment not directly related to children, can be considered by the NICS/Oasis Child Safety Officer and personnel committee.
4. Any member whose children (under the age of 18) have been determined to have committed sexual abuse or to have initiated inappropriate sexual behavior with another child will be asked to follow through with the action plan put in place to resolve the causes and effects of the abuse or inappropriate sexual behavior, taking into account such factors as age, age difference between offender and victim(s), seriousness of the offense(s), acknowledgement of responsibility, and effective treatment. Failure to do so will lead to termination of their relationship with NICS/Oasis. Reapplication would be evaluated on a case-by-case basis and involve effective treatment and other factors listed above.
5. If NICS/Oasis is asked to provide a reference, the agency will generally disclose the reasons for termination when the termination involves abuse. Further, if the agency becomes aware that a former member, volunteer, or employee of a NICS/Oasis school becomes employed by another organization where the individual has access to children, NICS/Oasis will normally make that organization aware of the reasons for the agency's termination of employment of the individual.

## **Follow-up**

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

## **A. Debrief**

1. Everyone involved in a child abuse allegation incident should have a time of debriefing.
2. The debrief process will be led by one or more individuals experienced in debriefing after crisis situations. Ideally, this will be a licensed professional counselor (LPC) with appropriate background and experience.
3. The debrief leader (or LCP referred to above) will guide the individual (or group) involved in the incident through a time of reflection on their experience. The intent is to maximize their understanding and learning regarding the incident and to help process emotional responses in a healthy way.
4. Debrief should be provided for:
  - a) The victim(s)
  - b) The alleged offender
  - c) All NICS/Oasis members at the affected school. This would include an evaluation of how to modify relevant systems to improve children's safety.
  - d) The Child Safety Assessment team members. This would include an evaluation of procedures that can/need to be improved.

## **B. Counseling**

When a child has suffered abuse, counseling for the child and his/her parents is a top priority. NICS/Oasis will work with the school director and the family to determine the best plan for the family to obtain counseling. NICS/Oasis has a responsibility to care for the victims of verified abuse and their families and reserves the right to require counseling in order to fulfill that responsibility.

[updated 02-04-2022]