



ISH

INTERNATIONAL
SCHOOL OF
HELSINKI

CHILD SAFEGUARDING

Executive Summary.....	3
Duty of Care.....	4
UN Convention on the Rights of the Child.....	4
Child Safeguarding Policy Definitions.....	5
Definition of Child Abuse and Neglect.....	5
Definition of Discrimination.....	5
Definition of Identity-Based Harm.....	6
Definition of Restorative Practices.....	6
Caretaker, Parents, and Guardians.....	6
Standard Operating Procedures (SOP).....	7
Prevention.....	7
Policy Statements.....	7
Organizational Framework	8
Reporting Structure.....	9
Recruitment.....	9
Employment Records.....	9
Code of Conduct.....	10
Training.....	10
Protection.....	11
Indicators that a Child May be Suffering Abuse.....	11
Reporting Concerns.....	12
Handling a Disclosure.....	12
Support.....	13
Monitoring and Evaluation of the Safeguarding Policy and Procedures.....	14
Appendix 1: Forms of Abuse.....	15
Physical abuse.....	15
Emotional abuse.....	15
Neglect and Negligent Treatment.....	15
Sexual Abuse.....	15
Discrimination.....	16
Identity based harm.....	16
Emerging digital abuse technologies and crimes: AI and Deepfake Abuse.....	16
Appendix 2: Staff and Student Interaction/Communication Guidelines.....	17
Physical Touch Guidelines.....	17
Verbal Communication Guidelines.....	18
Digital Communication Guidelines.....	18
Appendix 3: Code of Conduct.....	19
Appendix 4: Report of Concern Form.....	21

Executive Summary

The ISH Child Safeguarding Policy¹ seeks to protect the student, the family, and the ISH community. It ensures that the right to protection and access to confidential support systems is available to all students. It is the responsibility of the adults of our community to recognize and respond to various forms of abuse, neglect, identity based harm and discrimination to ensure the mental, physical and emotional safety of our learners.

Our school's mission is inclusive, challenging and engaged. To ensure safety, our catalysts of wellbeing and belonging form the foundations to meet our mission of inclusive education.

At ISH, we begin with belonging.

We all belong in a learning community filled with diverse identities and perspectives. For each to be known, we pursue learning equity through identity-affirming practice.

At ISH, we cherish our diversity AND strengthen our collective commitment to honor human dignity through validating the systemic challenges faced by marginalized communities. To that end, we create developmentally appropriate spaces for community members to explore all aspects of identity. Safeguarding these conditions for belonging empowers learners to practice the personal and collaborative skills necessary for global citizenship. This work is never-ending, and we bravely pledge ongoing growth and understanding.

-ISH Statement of Belonging

Duty of Care

Child abuse, neglect, identity based harm and discrimination are critical concerns in schools throughout the world. These are violations of a child's human rights and are obstacles to a child's education as well as to their physical, emotional, and social development.

The International School of Helsinki (ISH) has a responsibility to protect children. In this role we need to ensure that all children in our care are afforded a safe and secure environment in which to grow and develop. As educators, we have the opportunity to observe and interact with children over time on a daily basis, and are in a unique position to identify children who need help and protection. As such, we have a professional, ethical and legal obligation to identify children who

are in need of protection and to take steps to ensure that the child and family avail themselves of the services needed to remedy any situation that constitutes child abuse, neglect, identity based harm and discrimination.

¹ This policy is based on the Child Protection work of the American School of Zagreb and the Jakarta Intercultural School, and it acknowledges the advanced work in Child Safeguarding developed by JIS. It has been developed in line with the International Task Force on Child Protection, The Association of International Schools in Africa, the relevant Finnish Child Protection Laws, and the United Nations Convention on the Rights of the Child. The Central and Eastern European Schools Association (CEESA), the US State Department, and the Office of Overseas Schools, who contributed to the development of this policy and training, are acknowledged as Child Safeguarding advocates. This update includes the recommendations by CIS on [Identity-Based Harm](#). This policy is also fully aligned with ISH Board and School Policies and is entirely in line with the ISH Guiding Statement. The ISH child safeguarding team reviews and approves this policy annually.

All faculty and staff at the International School of Helsinki are mandated to report their concerns about the well-being of any student. Reporting and follow up of all suspected incidences of child abuse, neglect, identity based harm and/or discrimination will proceed in accordance with procedures in the Standard Operating Procedures linked to this policy. Furthermore, cases of suspected child abuse or neglect will be reported to local authorities in accordance with Finnish Child Welfare regulations and [Finnish legislation](#). In Finland, [discrimination](#) is forbidden under the Constitution, the Non-Discrimination Act, the Equality Act, and the Penal Code.

The International School of Helsinki endorses the [UN Convention on the Rights of the Child](#), of which our host country, Finland, is a signatory and seeks to be a safe haven for students who may be experiencing abuse, neglect, identity based harm or discrimination in any aspect of their lives. The International School of Helsinki will make this policy available to all parents through its website. It will annually carry out training with all faculty and staff on child protection issues, and will make every effort to implement hiring practices to ensure the safety of children. In the case of a staff member reported as an alleged offender, the International School of Helsinki will conduct a full inquiry following a carefully designed course of due process.

UN Convention on the Rights of the Child

[The UN Convention on the Rights of the Child](#) includes 54 articles to which governments are expected to be signatories. The principal articles, relevant to ISH, include:

Article 2: The Convention applies to every child without discrimination, whatever their ethnicity, sex, religion, language, abilities or any other statutes, whatever they think or say, whatever their family background.

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

Article 8: Every child has the right to an identity. [Governments] must respect and protect that right, and prevent the child's name, nationality or family relationships from being changed unlawfully.

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: [Governments] must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.

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.

Child Safeguarding Policy Definitions

Definition of Child Abuse and Neglect

The International School of Helsinki has a rich and diverse community with multiple cultural beliefs, values and practices. To respect the global nature of the community, for the purposes of our Child Safeguarding policy, we have chosen to follow the World Health Organization's (WHO's) definition of abuse and neglect.

The WHO declares:

“Child abuse or maltreatment constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”²

The WHO further emphasizes:

It is important to emphasize that children are the victims and are never to blame for maltreatment. Characteristics of an individual child that may increase the likelihood of being maltreated include:

- *being either under four years old or an adolescent*
- *being unwanted, or failing to fulfill the expectations of parents*
- *having special needs, crying persistently or having abnormal physical features*
- *having an intellectual disability or neurological disorder*
- *identifying as or being identified as lesbian, gay, bisexual or transgender.*

For the purposes of this document a CHILD is defined as being any person under the age of 18 or any person enrolled at ISH as a full-time student, even if that person has reached their 18th birthday.

A detailed explanation of the different types of child abuse and possible symptoms is given in [Appendix 1](#).

Definition of Discrimination

Discrimination as a form of abuse in schools refers to the unjust and prejudiced treatment of students based on their personal characteristics or identities, including race, skin color, ethnicity, caste, religion, gender identity, gender expression, sexual identity, national origin, citizenship status, socioeconomic status, political views, age, language, family structures, physical abilities, neurodiversity, and health. It involves actions, attitudes, or policies that marginalize, exclude, or harm individuals or groups, perpetuating inequity and fostering a hostile learning environment. Discrimination can manifest in various ways, including verbal harassment, unequal access to resources, social exclusion, and biased disciplinary actions. Addressing discrimination in schools is crucial not only to protect the well-being and dignity of all students but also to promote a fair and inclusive educational environment that nurtures diversity and equity.

² <https://www.who.int/news-room/fact-sheets/detail/child-maltreatment>

Definition of Identity-Based Harm

Identity-Based Harm: Identity-based harm is a specific type of discrimination that refers to the direct and personal damage inflicted on individuals or groups. While all identity-based harms are discriminatory, they highlight the immediate, personal impact of such prejudice and injustice. At the International School of Helsinki, we recognize that patterns of identity-based harm, which targets individuals based on their race, skin color, ethnicity, caste, religion, gender identity, gender expression, sexual identity, national origin, citizenship status, socioeconomic status, political views, age, language, family structures, physical abilities, neurodiversity, and health constitutes a form of abuse. It is rooted in prejudice and systemic inequalities and can have profound psychological, emotional, and social consequences for the targeted individuals or groups.

Definition of Restorative Practices

Restorative practices are a whole school teaching and learning approach that encourage supportive and respectful behavior. They focus on building and maintaining positive relationships to develop and sustain a learning environment that prioritizes respect, inclusion, cooperation, accountability and responsibility. A restorative approach offers a continuum of strategies that promote self regulation, communication and conflict resolution. Where there is a conflict, restorative practices involve working with an individual and supporting them in being accountable for their actions and repairing any harm caused to others as a result of those actions.

Caretaker, Parents, and Guardians

ISH defines caretaker as follows: An adult designated to make any and all legal, financial, social and medical decisions for the child in the parents' or guardians' absence. It is the school's responsibility to ensure that all enrolled students have designated caregivers in place.

Should parents/legal guardians leave the country for any reason, the responsibility for informing the school of all appropriate contact details lies with the parent or guardian.

[Temporary Change of Guardian/Caretaker Forms](#) are available from ISH and should be completed by parents/guardians before leaving the country. This ensures a designated guardian is available to make necessary welfare decisions, allowing ISH to meet its commitment to student safety and access to support services in line with Finnish regulations.

Standard Operating Procedures (SOP)

There are three main elements to our Child Safeguarding policy and procedures:

- **Prevention** through the creation of a positive school atmosphere, the design and implementation of the learning and the support offered to students.
- **Protection** by following agreed principles and procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to Child Safeguarding concerns.
- **Support** for students who have encountered abuse, neglect or harm.

Prevention

One cannot underestimate the importance of teaching, learning and strong healthy relationships to help protect students. The annual social emotional counseling curriculum program offered at the International School of Helsinki is regularly updated and includes information about child protection and anti-discrimination for all grade levels. There are a wide range of other preventative measures incorporated into the school programming such as weekly small group gatherings with students, advisory lessons, affinity groups for students and staff from marginalized communities and parent wellbeing programming.

Policy Statements

- [Statement of Belonging:](#) This statement embodies the mission, vision and values of the ISH community.
- Responding to Student Safety concerns: The International School of Helsinki recognizes the need for all teachers and staff to respond to all suspected cases of abuse, neglect, and identity-based harm as outlined in Appendix 1 Forms of Abuse.
- Restorative Approach to Identity Based Harm: The International School of Helsinki adopts a restorative approach to address identity-based harm, discrimination, or harassment. We believe in fostering a school environment where all students are treated with respect and dignity, regardless of their background or characteristics.
- Vulnerability of Marginalized Identities: We recognize that individuals with marginalized identities are at particular risk for identity-based harm. The International School of Helsinki is dedicated to providing additional support and protection to these individuals to ensure their safety and well-being through professional development, advisory programs, counseling, student initiative and/or other avenues to educate the community about identity-based harm, discrimination and forms of abuse.
- Sexual Abuse and Marginalized Identities: We acknowledge that within the same systems where identity-based harm operates, marginalized identities are at a higher risk of being targeted for sexual abuse. Our school takes this matter seriously and will address it with urgency and sensitivity while utilizing school and community resources.
- Forms of Identity-Based Harm: Identity-based harm can manifest in various forms, including but not limited to a pattern of microaggressions, hate speech, unwanted online behavior and harassment, person-to-person abuse, physical violence, and social exclusion. Depending on the severity of the harm restorative practices and community resources will be contacted to promote healing, accountability and possibly legal avenues.

Child Safeguarding is the responsibility of all adults and especially those working with students. The International School of Helsinki will implement preventive measures grounded in restorative principles to reduce the risk of abuse, neglect, and harm including identity-based harm. These measures may include awareness campaigns, workshops, and training for students and staff to promote respectful and inclusive behavior. The International School of Helsinki recognizes that trauma-informed restorative practices may be appropriate when addressing any form of abuse, neglect or harm including identity-based harm. This approach aims to maintain agency and dignity for the person who is targeted while building responsibility and accountability for the person who has committed the harm. When there is a case of harm in our community, restorative

practices will be led by trained staff to guide next steps.

Organizational Framework

The development of appropriate procedures and the monitoring of good practice are the responsibilities of the Child Safeguarding Team. It is the role of the Head of School to ensure that all of the child safeguarding procedures are followed within the school. If for any reason the Head of School is unavailable, the Wellbeing Lead will act in their absence. Additionally, it is the role of the Head of School to ensure that all staff employed, including temporary staff and volunteers within the school, are aware of the school's internal procedures, to advise staff and to offer support to those requiring support.

The Head of School is responsible for ensuring that the Child Safeguarding Team is convened on a monthly basis to:

- Review the Child Safeguarding Policy and Procedures Manual (annually)
- Ensure that Reports of Concern are logged by Wellbeing Lead
- Plan and report on training.
- Review and consider lessons learnt from specific incidents.

The **Child Safeguarding Team** will include the Head of School, the School Counselors, the City Counselor and the Individualised Learning Lead. The role of the Head of School is to review all cases referred to them and ensure that cases are referred to external agencies where appropriate.

The role of the School Board is to ensure that the school has an effective policy and to support the school in the fulfillment of this policy. All adults working with or on behalf of students have a 'Duty of Care' to report concerns. There are, however, key people within the school organization who have specific responsibilities and training to assess and evaluate concerns in accordance with Child Safeguarding procedures. The names of those carrying out these responsibilities for the current year are the Safeguarding Team, composed of: the Wellbeing Lead, Head of School, Individualized Learning Lead, all School Counselors, and the City Counselor.

School Psychologist & City Counselor . The Counseling Team is responsible for handling specific reports of concern, working with the student and/or family to ensure that the child's interests are protected. Counseling should notify the Head of School and alert them of any serious allegations that might require additional intervention given the nature and severity of the report.

Reporting Structure

Any member of staff who has reason for concern about a child safeguarding issue should complete a Report of Concern Form (Appendix 4) and pass it to any member of the Child Safeguarding Team on the same school day, preferably one from the same division as the student about whom there is a concern. This colleague will then determine follow-up actions. A paper copy of the report will be stored in a locked file cabinet with the wellbeing lead.

Under certain circumstances, however, the report **must** be made to a person with the appropriate level of authority as follows:

If the concern involves a member of the staff, the Report of Concern should be made to the Head of School since this may become a disciplinary matter. Where necessary, the identity of the person making a report about another member of staff will remain confidential.

If the concern involves an auxiliary teacher (ISH instructor, community sports or service programs etc.), then the Report of Concern should go to the Head of School immediately.

If the concern involves a contractor, then the Report of Concern must be made to the Business Manager.

If the concern involves the Head of School (or a member of the Board of Management) then the report should be made to the Chair of the School Board.

All students found to be under the influence of alcohol/other substances at ISH require a report of concern (Appendix 4) and social services notification as outlined by Finnish law.

Recruitment

It is the school's responsibility to ensure, as far as is practicable, that its employees are suitable people to work with children. ISH implements a number of checks during its recruitment process with the aim of ensuring that:

- Candidates who have a criminal record or about whom there have been some concerns about their suitability to work with children are not offered a position.
- Successful candidates fully understand their responsibilities towards ongoing training in Child Safeguarding while employed at the school.
- ISH maintains appropriate records that might be required in a possible future inquiry.

ISH will work with the recruitment agencies to ensure that the reference checks and background screening undertaken by such agencies compliments ISH's own recruitment protocols. Local Background checks are required for all local staff and for those expatriate staff who are not able to provide a police clearance certificate from their last location, or there are concerns about the reliability of such certificates.

Employment Records

The following records will be maintained by ISH in respect of every employee, either in hard copy or digital format:

- Full CV (any gaps in employment accounted for)
- Statement of Suitability by the candidate
- Reference checks that cover the last two periods of employment
- Certified copies of education certificates.
- Signed "Acknowledgement Safeguarding Policies, Procedures and Code of Conduct"

Police Reports from home of record and place of last employment need to be presented when

joining the school. These records cannot be kept on file, however.

ISH's Recruitment Protocols are summarized below:

- **Application** - Candidates are required to sign a "Statement of Suitability" stating that they do not have a criminal record, know of no reason why they should be considered unsuitable to work with children, and acknowledge the requirement of a Background Check should they be considered a suitable candidate.
- **Interview**- At least one member of the interview process will have been trained in child safeguarding protocols and identity-based harm and will be tasked with asking candidates about their Child Safeguarding experiences.
- **Screening** - A job offer will be made conditional on satisfactory references from at least two previous employers. Candidates should present a police clearance certification from their Home of Record. ISH will request a full background check by an external agency where it is deemed appropriate.
- **Contractual Employees** will be required to:
 - o Sign an Acknowledgement of Safeguarding Code of Conduct with each contract renewal
 - o Undergo full Child Safeguarding training as part of their orientation and then every year after.
 - o ISH's **Statement of Suitability** is given in Appendix 2.
- **Human Resources** - ISH will maintain records noting when the background check was confirmed to ensure compliance in respect of the above for every employee.

Code of Conduct

Every employee will be expected to adhere to the **Code of Conduct** with each contract renewal. A copy of the Code of Conduct is given in [Appendix 3](#).

If an employee is observed to be acting inappropriately towards, or in the presence of, a student, then this must be reported to the Head of School and will be dealt with confidentiality as a disciplinary matter.

ISH will endeavor to ensure that all community groups and instructors, who use our facilities outside of normal school hours, understand ISH's Child Safeguarding Policies and Procedures and that coaches and other adults have received Level 1 Child Safeguarding orientation as appropriate.

Training

All adults who are regularly on ISH's campuses will be expected to undergo appropriate training on an annual basis. Initial training will be delivered in-house, normally during the orientation process. Thereafter, staff will be expected to undergo yearly refresher training. The head of school is responsible for student welfare and will oversee the training process.

Staff development at the International School of Helsinki will also include comprehensive training and resources on how to recognize and respond to identity-based harm using restorative practices. This training will enable our staff members to actively contribute to creating a safe and

inclusive environment for all students.

A strong part of the ISH culture is the warmth and openness of relationships between staff and students. ISH believes that these should be preserved while simultaneously ensuring that all students remain safe and comfortable while at school.

Staff members will verify that they have read this Child Safeguarding Policy and Procedures and understood how to report concerns.

Staff and Student Interaction Guidelines are given in [Appendix 2](#)

Training hierarchy

All Adults

- All adults who are regularly on campus, including parents, ASA coaches, board members, interns and volunteers.
- General Duty of Care: ISH Child Safeguarding Policies and Procedures, how to identify and report concerns

Faculty and Staff

- Understanding Child Safeguarding, types and symptoms of abuse, neglect and discrimination know to handle disclosures and discuss child safeguarding issues with peers
- Understanding Restorative Practices and their application in a school setting

Counseling Staff

- Serious case reviews, information sharing and documentation, framework for assessment, specific types of abuse
- Working with students and families
- How to follow up with a reported concern
- When to make referral

Protection

Indicators that a Child May be Suffering Abuse

The following physical and emotional/behavioral indicators may suggest that a child is in need of support and potentially at risk of/suffering from some form of abuse. They may also be an indication of something else such as bereavement or other temporary trauma. It is important to report anything seen or observed so that trained counselors can meet with the child.

- Physical injuries that are not explained satisfactorily by the parents, guardians or caretakers.
- Students exhibiting dangerous social behaviors such as drug or alcohol abuse or risky sexual behavior
- Repeated absences from school without excuse or explanation

- Student exhibiting psychological problems such as hyper-anxiety or depression
- A student carrying too much responsibility for the family's everyday life that is inappropriate for their age.
- Students using or referring to sexual language or materials that are inappropriate for their age.
- Absence of parent engagement or communication with school
- Parents, guardians or caretakers suffering from psychological problems or illnesses, such as depression.
- Parents, guardians or caretakers substance abuse.
- Domestic violence or interpersonal violence in the family.
- Sudden and unexpected behavioral changes including self-isolation, self harm and aggression.

Reporting Concerns

“Doing nothing is not an option.”

All adults have a duty to act if they have a concern about a child's welfare. Abuse, neglect and identity based harm can take many forms. Frequently both victims and perpetrators work hard to conceal that harm is taking place. A concern may just be a “gut reaction” to something heard or observed which doesn't feel right. It may be more specific by way of a witnessed event or disclosure. Whatever the nature of the concern, adults will be expected to:

- Recognize their concern.
- Make a written report by completing a **Report of Concern Form** ([Appendix 4](#)) which can be downloaded from the ISH Staff Site.
- Pass on their concern to a member of the Child Safeguarding Team within 24 hours. A specific disclosure by a student must be reported before the close of the school day.

Concerns or alerts may be as a result of:

- **Observed** student behavior (physical, emotional, change in behavior)
- **Hearsay** (third party disclosure)
- **Disclosure** (specific report made by a student directly or via a trusted adult)
- **Observed** adult behavior (breach of Code of Conduct)

Handling a Disclosure

Any adult, to whom a student makes a disclosure, must:

Listen carefully to what is said. Don't interrupt or prompt. Let the child tell the story in their own words. Keep in mind there may be cases when they may need the help of translation or translation devices. A voluntary list of staff who speak various languages is to be updated on an annual basis. Use **TED** questions:

- **TELL** me what happened
- **EXPLAIN** what happened
- **DESCRIBE** what happened

Reassure the child that they are right to speak up. Be calm, attentive, nonjudgmental. Don't show any emotion other than sympathy.

Confidentiality – Make it clear that this cannot be kept a secret and that you have a duty to report it to a Counselor who is properly trained to help students in this situation.

Question the child only if necessary to clarify something that is unclear such as when and where. Do not ask leading questions.

Action – contact a member of the Child safeguarding Team and complete a Report of Concern form before you leave school that day.

Write it down – use the child's words as far as possible and record anything else that concerns you.

Support

Support for students comes in many forms at the International School of Helsinki and depends on the individual student's developmental level, severity of need and the students openness to receiving help. Students can self-refer themselves to their grade level counselor at any time for a confidential meeting. Students also have access to the Helsinki community counselor, Helsinki city nurse and at times the Helsinki city school psychologist. It is the area of expertise of the Helsinki community counselor to assist students in finding outside resources for support. The list of counselors emails will be made available to all upper school students on a regular basis. The Lower School Counselors' emails will be shared with the parents of the Lower School community. Students can also walk into any counselors office to seek support or leave a private note in the mailbox by the city nurse and city community counselors offices.

Confidential counseling support is available to all students at ISH including the students who caused the harm. Counseling services may include restorative meetings, group or individual counseling sessions, advocacy to the division leads, collaborative meetings with parents or social service providers or support finding resources.

Support is also available for the adults involved in the situation. Teachers are invited to debrief concerning student situations with counselors at school. Student confidentiality requirements mean that private information about students may not be shared with staff without consent. If there is a need for outside counseling for staff, the occupational health services provide private counseling services outside of school. These staff resources can be located by contacting the business office. The adults involved may need to process the situation, especially if it is related to personal experience or identity-based cases that can be traumatic or bring up past trauma for those who hold marginalized identities.

Monitoring and Evaluation of the Safeguarding Policy and Procedures

Ongoing Monitoring and Assessment: The International School of Helsinki will regularly assess the effectiveness of our identity-based harm prevention and response measures grounded in restorative principles and community based services. These assessments will include schoolwide wellbeing surveys such as the Finnish THL survey for students. Students and parents will be invited to review the policies as part of the Wellbeing Advisory Council that meets twice a year with the support of the Wellbeing Lead.

Annual Review: This policy will be reviewed annually by the Child Safeguarding Team and other community members to ensure it remains up-to-date and aligned with best practices in child safeguarding and addressing identity-based harm using restorative practices and community based services. Feedback on safeguarding practices should be gathered from students, staff and parents annually. All three sections of the policy including prevention, protection, and support will be included in the annual review.

Appendix 1: Forms of Abuse

Physical abuse

Physical abuse of a child is a form of abuse, which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or caregiver fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve children frequently feeling frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. Identity-based harm is a significant component of emotional abuse, and is characterized by behaviors that undermine or attack parts of one's identity. Emotional neglect is also a dimension of emotional abuse.

Neglect and Negligent Treatment

Neglect is the persistent failure to meet a child's basic physical, educational and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or caregiver failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. All students found to be under the influence of alcohol/other substances at ISH require a report of concern (Appendix 4) and social services notification as outlined by Finnish law.

Sexual Abuse

Child sexual abuse is the involvement of a child in sexual activity that they do not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for

example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, sharing, or aiding in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by any one gender. People of all genders can commit acts of sexual abuse, as can other children.

Discrimination

Discrimination as a form of abuse in schools refers to the unjust and prejudiced treatment of students based on their personal characteristics or identities, including race, skin color, ethnicity, caste, religion, gender identity, gender expression, sexual identity, national origin, citizenship status, socioeconomic status, political views, age, language, family structures, physical abilities, neurodiversity, and health. It involves actions, learning design, attitudes, or policies that marginalize, exclude, or harm individuals or groups, perpetuating inequity and fostering a hostile learning environment. Discrimination can manifest in various ways, including verbal harassment, unequal access to resources, social exclusion, and biased disciplinary actions. Addressing discrimination in schools is crucial not only to protect the well-being and dignity of all students but also to promote a fair and inclusive educational environment that nurtures diversity and equity. Identity centered learning is critical to ensure student safety and wellbeing.

Identity based harm

Identity-based harm is a specific type of discrimination that refers to the direct and personal damage inflicted on individuals or groups. While all identity-based harms are discriminatory, they highlight the immediate, personal impact of such prejudice and injustice. At the International School of Helsinki, we recognize that patterns of identity-based harm, which targets individuals based on their race, skin color, ethnicity, caste, religion, gender identity, gender expression, sexual identity, national origin, citizenship status, socioeconomic status, political views, age, language, family structures, physical abilities, neurodiversity, and health constitutes a form of abuse. It is rooted in prejudice and systemic inequalities and can have profound psychological, emotional, and social consequences for the targeted individuals or groups.

Emerging digital abuse technologies and crimes: AI and Deepfake Abuse

AI and deepfake abuse in our safeguarding manual highlights the alarming use of artificial intelligence technologies to maliciously alter or create digital content, with a significant concern being its application in generating pornographic or sexually suggestive material. These deepfakes can fabricate highly realistic but entirely false images or videos, often portraying individuals in explicit contexts without their consent. This not only constitutes a severe violation of privacy and dignity but also poses risks of sexual exploitation, harassment, and lasting psychological harm. Such content can lead to reputational damage, emotional distress, and can be used for blackmail or cyberbullying. Our institution is deeply committed to addressing this grave issue, providing education on the ethical implications, promoting digital literacy to identify such abuses, and offering robust support systems for anyone affected by this form of digital exploitation. We prioritize a safe and respectful environment, where students and staff are equipped to recognize, report, and confront any instances of AI and deepfake abuse, particularly in cases involving pornographic or sexually suggestive content. Other digital crimes in Finland include: defamation, menace, stalking, identity theft, dissemination of information violating personal privacy, solicitation

of a child for sexual purposes, sexual abuse of a child, and fraud. For more information see [Riku: Internet Crimes](#).

Appendix 2: Staff and Student Interaction/Communication Guidelines

When communicating with students and their families, it is crucial to adopt a culturally responsive approach to ensure that the diverse identities of families are respected and affirmed. Families at international schools often come from multilingual, transcultural backgrounds and are highly mobile, which means they may lack the same support structures available to others. To effectively engage with these families, we must connect with students and their families in a way that acknowledges and honors their unique experiences and needs.

Physical Touch Guidelines

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with students this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, background and consent. Appropriate physical contact in schools may occur most often with younger pupils.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should therefore, use their professional judgment at all times.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported and documented.

This means that adults should:

- report and record any situation, which they feel might compromise the school or their own professional standing
- report any indications (verbal, written or physical) that suggest a student may be infatuated with a member of staff
- be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described
- never touch a child in a way which may be considered indecent
- always be prepared to explain actions and accept that all physical contact be open to scrutiny
- never indulge in horseplay, tickling or fun fights
- respect the physical, verbal and non-verbal boundaries of the child

Physical contact, which occurs regularly with an individual child or young person, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with special educational needs or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and - so far as is possible - use a level of contact which is

acceptable to the child for the minimum time necessary. Extra caution may be required where it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse. It is recognized that many such children are extremely needy and seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively by helping them to understand the importance of personal boundaries. The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child.

Verbal Communication Guidelines

It is paramount to establish norms for verbal communication to prevent harm in a school setting to foster a safe and inclusive environment. It starts with cultivating awareness of the power of words and their potential to impact students deeply. Adults are encouraged to engage in open and empathetic conversations, actively listening to students and validating their experiences. It's essential to model respectful and inclusive language, avoiding derogatory remarks or stereotypes related to a student's race, skin color, ethnicity, caste, religion, gender identity, gender expression, sexual identity, national origin, citizenship status, socioeconomic status, political views, age, language, family structures, physical abilities, neurodiversity, and health. Furthermore, adults must intervene promptly when they witness discriminatory or hurtful language, creating a culture where such behavior is not tolerated. By prioritizing thoughtful and respectful verbal communication, adults can play a vital role in shaping a school environment where students feel valued, protected, and empowered to learn and thrive.

Digital Communication Guidelines

Communication with children is governed by the key safety concept of transparency. The following steps will reduce the risk of private or otherwise inappropriate communication between ISH parents, administration, teachers, personnel, volunteers, and minors:

Communications between ISH staff (including volunteers) and minors that are outside the role of the professional or volunteer relationship (teacher, coach, host, etc.) are prohibited.

Email exchanges between a minor and a person acting on behalf of the school are to be made using the school email address. Staff who use any form of online communications including social media and text messaging to communicate with minors may only do so for activities involving school business.

Appendix 3: Code of Conduct

ISH is committed to the safety and protection of children. This Code of Conduct applies to all faculty, staff, employees and volunteers who represent the school and who interact with children or young people in both a direct and/or unsupervised capacity.

The public and private conduct of faculty, staff, employees and volunteers acting on behalf of ISH can inspire and motivate those with whom they interact, or can cause great harm if inappropriate. 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 be particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries in such interactions. We must avoid any covert or overt sexual behaviors with those for whom we have responsibility. This includes seductive speech or gestures as well as physical contact that exploits, abuses, or harasses. Emotional boundaries are limits and rules people establish to protect their emotional well-being and maintain healthy relationships. They define how individuals allow others to treat them, what they are willing to accept or tolerate in interactions, and how they manage their own emotions in various situations. We are to provide safe environments for children at ISH. We must be aware of identity based harm and seek to recognize and report all forms of discrimination.

We must show prudent discretion before touching another person, especially children, 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. ISH personnel and volunteers are prohibited at all times from physically disciplining a child. Physical contact with children can be misconstrued both by the recipient and by those who observe it, and should occur only when completely non-sexual and otherwise developmentally appropriate. This is further outlined in the Appendix 2 section under Physical Touch Guidelines.

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, neglect or observed inappropriate behavior by another person towards a child must be reported as described in the Child Safeguarding Policy of the school.

Child Safeguarding Acknowledgement of Code of Conduct

All ISH staff members are required to adhere to the expectations outlined in this document, as these are mandatory under the internal regulations established by the ISH Board and those specified by the *Basic Education Act* of Finland. The school complies fully with the requirements for publication and communication as set forth in the law. All staff are expected to read and familiarize themselves with this document.

In fulfilling my duties at the International School of Helsinki, I commit to:

- Participating in all Child Safeguarding training required by the school.
- Treating everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Using positive reinforcement rather than criticism, competition, or comparison when working with children.
- Maintaining appropriate physical boundaries at all times and touching children—when necessary—only in ways that are appropriate, public, and non-sexual.
- Using inclusive language and avoiding derogatory or discriminatory remarks or stereotypes related to any student's race, skin color, ethnicity, caste, religion, gender identity, gender expression, sexual identity, national origin, citizenship status,

socioeconomic status, political views, age, language, family structures, physical abilities, neurodiversity, and health.

- Complying with the mandatory reporting regulations set out in ISH's Child Safeguarding Procedures to report suspected child abuse or observed inappropriate behavior towards a child, including hearsay and suspicion. Inaction is not an option.
- Cooperating fully in any inquiries into the abuse of children.
- Reporting and understanding the dangers of digitally manipulated media, such as deepfakes, that may be used to humiliate, bully, or target individuals.

I will not:

- Touch or speak to a child in a sexual or otherwise inappropriate manner.
- Inflict any physical or emotional abuse, such as striking, spanking, shaking, slapping, humiliation, ridiculing, threatening, or degrading children and/or youth.
- Smoke or use tobacco products, be under the influence of alcohol, or possess or use illegal drugs at any time while working with children and/or youth.
- Accept gifts from or give personal gifts to children without the knowledge of their parents or guardians.
- Engage in private communications with children via text messaging, direct messaging (DM), email, WhatsApp, Facebook, TikTok, Instagram, Twitter (X), or similar forms of electronic or social media, except for activities strictly involving school business.

I understand that as a staff member working with and/or providing services to children under the auspices of ISH, I am subject to a criminal history background check. By adhering to this Code of Conduct, I acknowledge that any actions inconsistent with these standards or failure to act as required may result in disciplinary action, up to and including termination of employment at ISH.

Appendix 4: Report of Concern Form

Please print and handwrite information or email to HOS and/or wellbeing lead as a PDF as this is highly confidential!

Child Safeguarding: Report of Concern	
Name of person making the report:	
Date of Report:	
Name of member of Child Safeguarding Team to whom report is given:	
Nature of Concern:	
Date, Time and Location of Incident / Observation:	
Name of Student (if known):	
Details of Concern: Concerns or alerts may be as a results of: <ul style="list-style-type: none"> • Observed behavior in a child (physical, emotional, change in behavior) • Hearsay (third party disclosure) • Disclosure (specific report made by a student directly or via a trusted adult) • Observed behavior in an adult (breach of Code of Conduct) <i>Provide full factual details only. State whether you witnessed the incident or if it was reported to you. If there was any conversation with the child, report their own words as closely as possible. (Continue overleaf if necessary.)</i>	
Follow up Action (if any): <i>(Did you make any follow- up action as a result of what you heard or witnessed?)</i>	
Signed by (reporter):	
Signed by (DSO/Recipient of report):	