Doküman Kodu	Yayın Tarihi	Revizyon No	Revizyon Tarihi
as-p-gen_Çocuk Koruma Prosedürü	08.04.2026	01	15.09.2026

Revizyon Takibi

Rev. No	Rev. Tarihi	Rev. Yapılan	Revizyonun Sebebi
01	15.09.2026	5.2.1	Her yıla ait ÇKE listelerinin EK-1 olarak verilmesi gerekliliği
02	15.09.2026	5.2.4	CPO genel müdür olacağından "Okul Yönetimi" başlığı altından genel müdür ifadesi çıkarıldı.
03	15.09.2026	5.3.2	Çocuğun kendisinin istismar/ihmal bildirimi yapması/bir çalışanın istismar şüphesi bildirimi yapmasında izlenecek görüşme protokolü bu maddeye eklendi, EK-3 olarak detaylar sunuldu.
04	15.09.2026	5.5.4	Metinde geçen "düşük seviye endişe formu" ifadesi "endişe formu" olarak güncellendi.
05	15.09.2026	5.6.3	Durumu derhal bildirilmesi cümlesi (orta ve yüksek risk durumlarında) Çocuk Koruma Sorumlusu'na (ÇKS) bildirir olarak değiştirildi.
06	15.09.2026	5.6.10	Erken tespit ve İzleme Mekanizmaları başlığı altındaki 2. Madde "Riskli davranışların erken fark edilmesi için rehberlik servisi tarafından yürütülen gözlem verilerin devir teslimlerde detaylı aktarımı" olarak değiştirildi.
07	15.09.2026	5.7.3	Çocuk koruma risk değerlendirme formu oluşturuldu. Ek-4 olarak dokümana eklendi.
08	15.09.2026	5.16	Personel Eğitimi başlığı altına İş sözleşmesinde yer alan Çocuk Koruma Prosedürü doğrultusunda yapılması ve kaçınılması gereken davranışlara ilişkin bu hükümler Ek-5 olarak eklendi

HAZIRLAYAN	KONTROL EDEN	ONAYLAYAN
Elmas Artkın	Elmas Artkın	Elmas Artkın

1. Purpose

The purpose of this document is to define the procedures to be implemented at Açı Schools to safeguard children and promote their safety and wellbeing. The procedure sets out the responsibilities of all school stakeholders—including school leadership, teachers, staff, students and families—in relation to child protection. It aims to ensure the early identification of risks, appropriate and effective intervention to safeguard children, and the transparent and traceable management and documentation of all relevant processes.

2. Scope

This procedure covers:

- the child protection responsibilities of all staff in their interactions with students;
- the monitoring, reporting and follow-up of any concerns relating to the safety or wellbeing of children, including the necessary intervention processes;
- the protection of children through coordinated work with families, school leadership and relevant external agencies.

3. Responsibilities

All staff working at Açı Schools are responsible for complying with and implementing this procedure.

4. Definitions

Child Protection: Child protection refers to the range of policies, procedures and practices designed to prevent, identify and respond effectively to risks that may threaten a child's health, safety, development and wellbeing. It is a shared system of responsibility in which schools, families and the wider community work together to protect children from physical, emotional and sexual abuse, neglect and other harmful circumstances. Child protection is guided by the best interests of the child and aims to identify potential harm at an early stage, take appropriate action and ensure that children are able to develop and thrive in a safe environment.

5. Procedure

5.1. Definitions, Examples and Early Warning Signs

5.1.1. Child

Under the United Nations Convention on the Rights of the Child, every person under the age of 18 is considered a child. At Açı Schools, regardless of a student's age, the best interests and safety of the child are fundamental principles within the educational environment.

5.1.2. Child Abuse and Neglect – General Definition

According to the World Health Organization, child abuse and neglect refers to all forms of maltreatment, abuse, neglect, negligent treatment or exploitation that result in actual or potential harm to a child's health, development, life or dignity within the context of a relationship of responsibility, trust or power.

5.1.3. Physical Abuse

Definition:

Physical abuse refers to physical harm caused to a child through non-accidental and preventable acts, including the use of physical violence against a child.

Examples:

- Slapping, hitting, pushing, kicking or shaking;
- Biting, choking, burning or poisoning;
- Hitting a child with an object or using physical punishment;
- Placing a child in a dangerous situation, such as leaving them alone in an unsafe environment.

Early warning signs – observations:

- Unexplained bruises or injuries, or repeated accidents;
- Wearing clothing inappropriate for the season in order to conceal injuries;
- Excessive fear of adults, being easily startled or reluctance to go home;
- An extreme reaction to physical contact or sudden movements.

5.1.4. Emotional / Psychological Abuse

Definition:

Emotional or psychological abuse refers to behaviours that cause significant emotional distress or harm to a child and adversely affect the child's sense of self-worth, sense of security and psychological development. A single severe incident may also constitute abuse.

Examples:

- Persistent humiliation, belittling, ridicule or labelling;

- Intimidation, threats, bullying or isolation;
- Imposing expectations that are inappropriate for the child's age and developmental level;
- Conditional affection, such as valuing the child only when they achieve or comply;
- Systematic ignoring, exclusion or manipulation.

Early warning signs:

- Withdrawal, severe anxiety or episodes of prolonged crying;
- Outbursts of anger or an increase in behavioural difficulties;
- A sudden decline in academic performance or expressions of worthlessness;
- Excessive compliance or being constantly on alert;
- Self-blame, intense shame or low self-esteem.

5.1.5. Sexual Abuse

Definition:

Sexual abuse refers to any use of a child by another person for the purpose of sexual stimulation, regardless of whether the child is aware of what is happening or whether consent is sought, and regardless of the child's sex or age. It includes both contact and non-contact sexual behaviours.

Examples:

- **Contact:** touching, kissing or forced sexual acts;
- **Non-contact:** sexually explicit comments or insinuations, or exhibitionism;
- Showing or sending sexually explicit material to a child;
- Sexualised communication with a child, grooming, or requesting photographs;
- Sexual exploitation of a child for commercial or other purposes.

Peer context:

Sexual abuse may occur not only at the hands of adults but also between children where there is a developmental difference, power imbalance, pressure or coercion.

Early warning signs:

- Sexual knowledge or behaviour that is inappropriate for the child's age;
- Sudden fears, sleep difficulties or nightmares;
- Physical complaints or pain/injury in the genital area;
- Avoidance of school or extreme avoidance of a particular person;
- Self-harming behaviour, intense shame or guilt.

5.1.6. Neglect

Definition:

Neglect refers to a situation in which a parent or caregiver fails, despite being able to do so, to provide the level of care necessary to meet a child's basic needs, resulting in an adverse impact on the child's wellbeing.

5.1.6.1. Physical Neglect

Examples: Failure to provide adequate nutrition, shelter or clothing; unsafe living conditions; failure to provide age-appropriate supervision.

Signs: Chronic hunger, consistently dirty or inappropriate clothing, poor hygiene, fatigue or frequent illness.

5.1.6.2. Medical Neglect

Examples: Failure or significant delay in seeking medical attention when a child is ill; failure to obtain vaccinations; refusal of treatment; failure to administer or monitor prescribed medication regularly.

Signs: Chronic or recurrent health complaints; untreated health conditions.

5.1.6.3. Educational Neglect

Examples: Failure to send a child to school during compulsory education; allowing persistent absenteeism; failing to respond to identified special educational needs.

Signs: Persistent absence from school; support needs being ignored.

5.1.6.4. Emotional Neglect

Examples: Failure to provide affection or attention; failure to provide secure attachment and emotional support; failure to seek or provide external psychological support when needed; inadequate supervision, particularly during adolescence.

Signs: Persistent loneliness, lack of belonging, emotional numbness or excessive attachment.

5.1.7. Peer-on-Peer Abuse

Definition:

Peer-on-peer abuse refers to harmful behaviour by one child towards another child in a physical, emotional, sexual or digital context. The risk increases where there is a difference in age or development, a power imbalance, coercion, pressure or threats.

Examples:

- Bullying, threats, exclusion or labelling;
- Physical assault;
- Sexually explicit language, images or behaviour, or non-consensual sexual contact;
- Cyberbullying, taking and sharing inappropriate images, or coercive behaviour.

Signs:

- Reluctance to attend school, sudden anxiety or a sudden decline in academic performance;
- Avoidance of particular groups;
- Sudden breakdown in social relationships, unexpected aggression or changes in behaviour;
- Panic in relation to digital activity or increased secrecy around phone use.

5.1.8. Online Abuse and Digital Risks

Definition:

Online abuse and digital risks refer to risks that threaten a child's safety in digital environments, including cyberbullying, online harassment, grooming, exposure to inappropriate content, and the creation of or coercion to create intimate or sexually explicit content.

Examples:

- Persistent messaging, threats or blackmail;

- Building trust for the purpose of grooming;
- Pressure to engage in sexually explicit messaging or sharing images without consent;
- Accessing or showing a child inappropriate content.

Signs:

- Anxiety while using a device or increased secrecy;
- Panic when receiving a phone notification or attempts to hide a device;
- Changes in mood or sleep difficulties;
- Statements or indications suggesting blackmail or threats.

5.1.9. Economic Exploitation

Definition:

Economic exploitation includes situations in which:

- a child is required to work in ways that are inappropriate for their age, development or physical capacity;
- a child does not receive appropriate compensation for their labour;
- a child is prevented from accessing education; or
- a child is regarded by family members or others as a source of income.

Examples:

- Requiring a child to work regularly in a family business, such as a restaurant, clinic or shop;
- Assigning long hours of work under the justification that the child is “helping the family”;
- Using a child as an influencer, model or content creator.

Signs:

- Being continuously engaged in lessons, courses, sports or other activities;
- Having insufficient time for rest or play;

- Being unable to manage or make decisions about their own time.

5.1.10. Domestic Violence

Definition:

Domestic violence refers to situations in which a child is subjected to violence within the family or witnesses violence between parents or caregivers. Exposure to domestic violence may have a significant impact on a child's psychological wellbeing and is therefore considered a safeguarding risk under this procedure.

Examples:

- Physical violence, threats or controlling behaviour within the home;
- The child seeing or hearing violence;
- Disruption to the child's care following an incident of violence.

Signs:

- Significant anxiety related to the home environment;
- Being constantly on alert or easily startled;
- Hints that "there are problems at home" or inconsistent explanations;
- Being repeatedly included in photo or video recordings;
- Appearing in social media content;
- Expressing discomfort about being included in such content.

5.2. Roles and Responsibilities

Child protection is a collective and systematic responsibility rather than an individual one. Due to their developmental characteristics, children may not have sufficient capacity to protect themselves from harmful physical, emotional and psychological influences. For this reason, awareness, early identification and appropriate intervention are among the strongest safeguards against child abuse and neglect.

At Açı Schools, child protection is approached as a whole-school system in which school leadership, teachers, all staff, students and parents share responsibility. The roles and responsibilities within this system are set out below.

5.2.1. Child Protection Officer – CPO

The Child Protection Officer (CPO) is the central coordinator of child protection and safeguarding processes within the school.

A Child Protection Team is appointed for each school before the beginning of every academic year. The Child Protection Teams for the 2026–2027 academic year are included in this document as **APPENDIX 1**.

The responsibilities of the CPO include:

- Reviewing recorded child protection concerns and adult-related concerns, including concerns, low-level concerns and allegations;
- Assessing and classifying reports according to the level of risk and determining the appropriate course of action;
- Taking immediate protective measures where necessary, with the child's safety as the priority;
- Coordinating, where necessary, with school leadership, the counselling and guidance department and relevant external agencies;
- Ensuring that child protection records are maintained confidentially, securely and with access restricted to authorised individuals;
- Ensuring that every report received is recorded;
- Planning and coordinating annual training, information and awareness-raising activities relating to child protection;
- Managing, monitoring and documenting investigation processes;
- Monitoring the implementation of policies and procedures and recommending updates where necessary.

5.2.3. Deputy Child Protection Officer – Deputy CPO

In the absence of the CPO, or when authorised by the CPO, the Deputy CPO assumes the CPO's duties and responsibilities.

Responsibilities include:

- Ensuring that processes continue without interruption and are carried out appropriately;

- Ensuring that reports are addressed in a timely manner;
- Maintaining ongoing communication and information sharing with the CPO.

5.2.4. School Leadership – Principal and Leadership Team

School leadership is responsible for ensuring that the child protection system operates effectively at an institutional level.

Responsibilities include:

- Ensuring the development, implementation and sustainability of the Child Protection Policy and Procedures;
- Ensuring that all staff receive information and training regarding their child protection responsibilities;
- Creating a safe and supportive school environment in which students can raise concerns about abuse and neglect;
- Implementing safer recruitment procedures in coordination with the Human Resources Department and conducting appropriate background checks on staff;
- Working with the CPO in reported cases and taking the necessary administrative decisions;
- Regularly monitoring and evaluating the school's child protection practices and taking appropriate measures for improvement;
- Cooperating with law enforcement and relevant public authorities where necessary.

5.2.5. All Staff

Teachers and all school staff play a key role in the early identification and reporting of concerns because of their direct and regular contact with children.

Responsibilities include:

- Remaining alert to changes in behaviour and physical or emotional signs that may indicate abuse or neglect;
- Where there are reasonable grounds for concern, reporting information received or observed to the authorised person promptly and without delay, in accordance with the school's child protection procedures, in an objective, impartial and non-judgemental manner;

- Following up on a reported concern or incident and, where they believe that the matter has not been adequately addressed, informing a senior member of leadership in writing;
- Maintaining open, trusting and supportive communication with students;
- Integrating age-appropriate learning about personal safety, boundaries and seeking help into educational processes;
- Cooperating with authorised personnel during investigation and assessment processes where necessary;
- Participating in child protection training and keeping up to date with relevant information;
- Maintaining the highest level of confidentiality throughout all reporting and safeguarding processes.

5.3. Concern Reporting Procedures

This section defines how any concern relating to a child's safety or wellbeing arising within Açı Schools will be addressed, who is responsible for each stage, what steps should be followed and how the appropriate level of intervention will be determined. The aim is to identify risks at an early stage, safeguard the child and manage the entire process in a recorded, consistent and child-centred manner.

5.3.1. Concern Relating to a Child

A concern relating to a child (**concern**) refers to an observation, information received or reasonable suspicion that a child may have experienced physical, emotional, psychological or social harm, or may be at risk of harm. It is not necessary to establish certainty; reasonable suspicion is sufficient to make a report.

At Açı Schools, concerns relating to children must be addressed without delay in order to prevent potential risks from escalating. Accordingly, all staff, regardless of their role, are required to follow the process set out below when they become aware of such a concern.

5.3.2. Reporting and Initial Assessment

A person who has a concern about a child must:

- Report the observation, information received or information disclosed to them to the Child Protection Officer (CPO) on the same day;
- Not attempt to investigate, interpret or resolve the matter independently;
- Not confront the child or any potential perpetrator.

Where a child discloses abuse or neglect, or where a member of staff reports a concern about possible abuse or neglect, any conversation with the child must be conducted in accordance with **APPENDIX 3 – Interview Protocols**. During the conversation, questions or approaches that may lead the child, influence their responses or encourage them to provide unnecessary detail must be avoided.

Following the report, the **Child Concern Report Form** must be completed fully and in objective, factual language by the person making the report. The form must contain only information that has been observed or reported. Personal opinions, assumptions or diagnoses must not be included.

5.3.3. Determining the Level of Risk

Following receipt of a report, the CPO conducts an initial assessment based on the information available and classifies the concern according to the level of risk. Where necessary, this assessment is conducted in cooperation with the counselling and guidance department and school leadership. In peer-related cases, the counselling and guidance department conducts a separate psychosocial assessment of both the child who has experienced harm and the child who has engaged in harmful behaviour.

Interventions are planned on the basis of approaches that are not punitive but establish clear boundaries, support accountability and promote restorative practice.

5.3.3.1. Low Risk

Low risk refers to situations in which there is no immediate or significant threat to the child's safety, but where monitoring and support are required.

In such cases:

- The child is monitored within the school;
- Counselling and psychological support are provided;
- Safe, structured individual meetings appropriate to the child's age and developmental level are conducted;
- The child's account is explored without leading questions, an interrogative approach or repeated requests to recount the same experience;
- The child's emotional state, sense of safety, awareness of boundaries and functioning at school—including participation in lessons, social relationships and behaviour—are monitored;
- Where necessary, age-appropriate psychoeducation is provided on personal boundaries, privacy, safe and unsafe behaviours, and ways of seeking help;

- Interventions are conducted without language or attitudes that may label the child, place blame on the child or cause the child to feel continuously “at risk”;
- The situation is monitored at regular intervals and only for as long as necessary. If an increase in the level of risk is observed, the situation is reassessed and escalated to the appropriate level of intervention;
- Necessary observations and interventions are documented;
- The situation is reviewed at regular intervals.

Examples:

- The student becomes withdrawn or displays sudden changes in mood;
- The student implies that they have experienced peer bullying, but there is no clear evidence;
- The student reports tension or difficulties at home;
- There are hygiene or care concerns that do not appear to reach a serious level of neglect;
- The student receives disturbing communication in a digital environment that does not involve threats.

5.3.3.2. Moderate Risk

Moderate risk refers to situations in which there are indications that the child’s wellbeing may have been adversely affected and which require, in addition to school-based support, cooperation with the family.

In such cases:

- The CPO develops a controlled communication plan that prioritises the best interests of the child;
- The parent(s)/guardian(s) are informed at an appropriate time and with appropriate information;
- A supportive intervention plan is developed for the child;
- The progress of the process is monitored and documented in a consistent and traceable manner.

Examples:

- Persistent hunger or poor hygiene suggesting possible physical neglect;
- Chronic absenteeism suggesting educational neglect;

- The child reports witnessing domestic violence;
- Peer bullying has become systematic;
- The child states, “I am left alone at home”;
- A child under the age of 18 is permitted to consume alcohol.

5.3.3.3. High Risk

High risk refers to situations involving suspected abuse or serious neglect that require the child to be protected immediately.

In such cases:

- The child’s immediate safety is prioritised;
- Relevant legal authorities and child protection agencies are contacted without delay;
- School procedures are carried out in accordance with the guidance of external authorities;
- All actions are documented in detail;
- In high-risk situations, the counselling and guidance department does not assume direct responsibility for making a legal notification; the process is coordinated by the CPO and school leadership.

However, where the counselling and guidance department determines that failure to make or delaying a notification may place the child at risk of harm under **Law No. 5395 on Child Protection** and the **Turkish Penal Code**, it informs the CPO of this assessment in writing.

Such notification forms part of the professional responsibilities of the counselling and guidance department.

Examples:

- The child states that they have been physically assaulted;
- A disclosure or suspicion of sexual abuse;
- Open wounds, bruising or unexplained trauma;
- A serious environment of violence at home;
- Grooming or sexually explicit communications;

- The child states, “I do not want to go home. I am scared.”

5.3.3.4. Record-Keeping and Confidentiality

All records relating to the child concern process must be:

- maintained in accordance with the principle of confidentiality;
- accessible only to authorised individuals;
- stored securely in encrypted systems.

Information may be shared only where necessary to safeguard the child and/or to fulfil legal obligations.

5.4. Allegation Against an Adult

An **allegation against an adult** refers to an allegation that an adult working within the school—including academic or administrative staff, leaders, volunteers, service providers, interns or any person acting on behalf of the school—has harmed a child, may pose a risk of harm to a child, or has engaged in behaviour that threatens child safety.

Such allegations require a high level of sensitivity with regard to the child’s safety, the rights of the adult concerned and the institution’s legal responsibilities. In such circumstances, Açı Schools is committed to placing the best interests of the child at the centre of the process while ensuring that the matter is handled fairly, impartially, promptly and with appropriate documentation.

5.4.1. Key Principles

The following principles apply without exception to cases involving an allegation against an adult.

- **The member of staff concerned must not be confronted.**

An individual meeting with the person who is the subject of the allegation may place both the child’s safety and the integrity of the legal process at risk.

- **No attempt must be made to gather evidence or conduct an investigation independently.**

Such actions may adversely affect formal investigation processes.

- **Confidentiality and prompt action are essential.**

Information must be shared only with authorised individuals and the process must not be unnecessarily delayed.

- **Impartiality must be maintained.**

The allegation must be considered without presuming its validity, while the rights of both the child and the adult concerned are respected.

5.4.2. Reporting and Initial Assessment

A person who becomes aware of an allegation against an adult or receives information of this nature must:

- report the matter immediately to the Child Protection Officer (CPO);
- not attempt to assess, verify or share the allegation independently with others.

Following receipt of the report, the CPO conducts an initial assessment together with the School Principal and Human Resources. The purpose of this assessment is to determine the nature of the allegation, the urgency of the risk to the child's safety and the appropriate course of action.

5.4.3. Protective and Administrative Measures

Where considered necessary following the initial assessment:

- the adult who is the subject of the allegation may be temporarily removed from duty, taking into account the integrity of the investigation and the safety of the child;
- such a measure does not constitute a disciplinary sanction or an allegation of criminal conduct. It is a protective and administrative measure.

Throughout the process, any statements that may damage the reputation of the person concerned must be avoided and confidentiality must be strictly maintained.

5.4.4. Legal Reporting and Cooperation with External Agencies

Depending on the nature of the allegation:

- relevant legal authorities and child protection agencies are notified without delay;
- the school provides full cooperation with any official investigation;
- internal school processes are structured in a manner that does not interfere with investigations conducted by external authorities.

5.4.5. Conduct and Monitoring of Internal Processes

- Internal administrative processes are conducted in parallel with and in alignment with any external investigation.
- All meetings, decisions and measures taken are documented in writing and retained as formal records.
- The child's psychological and emotional support needs are prioritised throughout the process.
- Following the conclusion of the investigation, any necessary corrective or preventive measures are reviewed.

5.4.6. Confidentiality and Information Sharing

In all processes involving an allegation against an adult:

- information sharing is restricted according to the **"need-to-know" principle** and limited to authorised persons, such as CPO members, the counsellor, the School Principal and Deputy Principal, and, depending on the nature of the incident, law enforcement or relevant official authorities;
- rumours, gossip and unauthorised disclosure of information are strictly prohibited;
- records relating to the process are stored securely and are accessible only to authorised individuals.

5.5. Low-Level Concern

A **low-level concern** refers to behaviour by an adult—including a member of staff, leader, volunteer or service provider—in their interaction with a child that pushes or crosses professional boundaries, is inconsistent with institutional expectations, or creates a "grey area" but does not, in itself, meet the threshold of a serious allegation of abuse. However, if such behaviour is repeated, ignored or develops into a pattern of inappropriate conduct, it may become a more serious safeguarding risk.

The purpose of this approach is not to "blame" individuals, but to identify concerns early, record them, address the behaviour and prevent the risk from escalating in order to strengthen children's safety. Low-level concern processes support a culture of safe reporting within the school and ensure that professional standards and expectations are clear and consistent for everyone.

5.5.1. What Is a Low-Level Concern Not?

A low-level concern:

- is not an allegation that an adult has directly harmed a child;

- may nevertheless constitute a breach of professional boundaries, even where there is no malicious intent;
- must therefore not be dismissed as “unimportant” or treated merely as a matter of “personal preference”.

A matter ceases to be treated as a low-level concern and is escalated to the appropriate adult safeguarding or immediate child protection process where there is:

- a suspicion of harm, abuse or serious neglect;
- sexually explicit behaviour, communication or insinuation;
- physical violence, threats or coercion;
- a situation that places the child’s safety at immediate risk.

5.5.2. Examples of Low-Level Concerns

The following behaviours may constitute examples of low-level concerns.

Digital and Communication Boundaries

- Individual messaging at inappropriate times or with unnecessary frequency;
- Private communication with a student through personal social media accounts;
- Excessive familiarity, unclear boundaries or sharing of personal information in messages.

Physical Boundaries

- Unnecessary physical contact, such as hugging or touching a student on the shoulder, where this is inappropriate in context or occurs repeatedly;
- Failure to respect the child’s privacy, such as being inappropriately present in private or enclosed spaces.

One-to-One and Physical Space Boundaries

- Frequently and without adequate justification being alone with a student;
- Routine one-to-one meetings behind closed doors;
- Spending extended periods of time with a student in areas where there is no appropriate oversight.

Language and Attitude

- Emphasising a “special relationship” with a student, such as saying, “You are different from the others”;
- Favouring a student or creating a perception that the student is receiving special treatment;
- Behaviours that may create emotional dependency on the adult.

Blurring of Professional Roles

- Becoming involved in a student’s family or personal matters beyond appropriate professional boundaries;
- Adopting a “I will solve it myself” approach instead of referring the student to the counselling and guidance department where appropriate;
- Giving or exchanging gifts or providing special privileges in ways that are inconsistent with institutional expectations.

5.5.3. Who Is Responsible for Reporting?

At Açı Schools, all staff are required to report, without delay and in writing, any low-level concern they observe or that is disclosed to them to the Child Protection Officer (CPO).

Reasonable suspicion is sufficient to make a report.

Statements such as “I am not sure” or “I may have misunderstood” are not valid reasons for failing to report a concern.

5.5.4. Low-Level Concern Process

Step 1 – Written Report

The person making the report must submit the concern to the CPO using the concern form, providing:

- the behaviour observed, including the date, time, location and context;
- factual and objective information only;
- no interpretation or diagnosis.

Step 2 – Recording

The CPO:

- records the report in the **Low-Level Concern Log**;
- shares information with the School Principal and/or Human Resources only on a need-to-know basis;
- checks whether the concern forms part of a pattern when considered alongside previous records relating to the same individual.

Step 3 – Initial Assessment and Classification

The CPO assesses the nature of the report and determines which of the following courses of action is appropriate. Where necessary, the CPO consults with the School Principal and members of the leadership team. Where the circumstances are clear, straightforward decisions are taken without unnecessary delay, and school leadership is informed.

- **A. Treat as a low-level concern** – corrective actions are planned;
- **B. Escalate to the Child Concern process** – where the primary focus is the child's safety or wellbeing;
- **C. Escalate to the Allegation Against an Adult process** – where the allegation has become more serious or the level of risk is high.

Step 4 – Feedback and Corrective Action Plan

Where a matter is classified as a low-level concern, the CPO, together with school leadership and/or Human Resources:

- plans a documented and professional feedback meeting with the adult concerned;
- clarifies expectations, including why the behaviour is not appropriate;
- provides a warning where necessary; and/or
- plans targeted training or refresher guidance, such as training on digital boundaries, physical contact or standards for one-to-one meetings.

The purpose of this step is not punishment, but to reduce risk and strengthen professional standards.

Step 5 – Monitoring

The CPO:

- ensures that monitoring or observation takes place for the agreed period;

- reassesses the situation if risk indicators recur or increase;
- keeps school leadership informed of the process.

Step 6 – Escalation in the Event of Recurrence or Increased Risk

A low-level concern is escalated to the **Allegation Against an Adult** process where it:

- recurs;
- develops into a pattern; or
- places the child's safety at significantly greater risk.

5.5.5. Confidentiality and Information Sharing

Low-level concern records:

- must be kept confidential;
- must be accessible only to authorised individuals;
- must not become the subject of rumours or unethical disclosure.

For the purpose of strengthening the school's safeguarding culture, these records may be used in institutional learning and evaluation activities, including training, provided that all information is appropriately anonymised.

5.5.6. Purpose and Institutional Position

Açı Schools implements the low-level concern approach in order to:

- strengthen children's safety;
- establish clear professional boundaries;
- manage risks before they escalate through early intervention;
- promote a safe reporting culture while protecting the child's confidentiality.

5.6. Peer-on-Peer Incidents

Peer-on-peer incidents refer to situations in which one child engages in physically, emotionally, sexually or digitally harmful behaviour towards another child. Such incidents may involve differences in age or developmental level, power imbalances, pressure, threats or coercion.

Açı Schools addresses peer-on-peer incidents based on the principle that **harmful behaviour creates responsibility, even when the person engaging in that behaviour is also a child**. This approach is not punitive; it is grounded in protection, education and restorative practice. The aim is to ensure the safety of the child who has been harmed, stop the harmful behaviour and maintain a safe school environment for all children.

5.6.1. Key Principles

The following principles apply to all peer-on-peer incidents:

- The safety and wellbeing of the child who has been harmed are always the priority.
- Harmful behaviour must not be disregarded on the grounds that it is simply “part of being a child”.
- Interventions are planned with due consideration to the child’s age, developmental level and the nature of the behaviour.
- Processes are managed confidentially, documented appropriately and in accordance with children’s rights. Appropriate measures are taken to prevent the matter from being discussed by individuals who are not directly involved in the process.
- The aim is not punishment, but protection, the setting of appropriate boundaries and supporting positive behavioural change.

5.6.2. Types of Behaviour Covered

Peer-on-peer incidents may include the following types of behaviour. These examples are illustrative and are not intended to be exhaustive.

5.6.2.1. Physical Harm

- Hitting, pushing, kicking or causing harm with an object
- Physical threats or the use of force

5.6.2.2. Emotional / Psychological Harm

- Belittling, persistent targeting, humiliating language, exclusion, intimidation or deliberate ignoring
- Threats, pressure or frightening behaviour
- Humiliating or labelling a child within a group

5.6.2.3. Sexualised Behaviour

- Non-consensual physical contact
- Sexually explicit or sexualised language, implications or behaviour
- Sexual behaviour that is inappropriate for the child's developmental level
- Sharing sexual images or pressuring a child to share such images

5.6.2.4. Harm in Digital Environments

- Cyberbullying
- Online harassment
- Threats, blackmail or the sharing of intimate content
- A student having access to private photographs relating to the life of the relevant adult

5.6.3. Reporting and Initial Response

Any person who becomes aware of or receives a report of a peer-on-peer incident must:

- report the matter to the Child Protection Officer (CPO) without delay, particularly where the risk is assessed as moderate or high;
- not question the parties independently or attempt to confront them;
- not minimise the incident or treat it as something that simply “happens between children”.

Upon receiving a report, the CPO:

- ensures that the child who has been harmed is safe immediately;
- separates the parties physically and socially where necessary;
- involves the counselling and psychological guidance department in the process and informs school leadership.

5.6.4. Assessment Process

The CPO, together with school leadership and the counselling and psychological guidance department, assesses the following:

- The nature and severity of the behaviour
- Whether the behaviour is persistent or recurring
- The age, developmental level and power balance between the parties
- The presence of consent, pressure or coercion
- Whether digital environments were involved
- The emotional and psychological wellbeing of the child who has been harmed

Based on this assessment, the incident is addressed within the appropriate framework, whether as a **concern, allegation or peer-on-peer incident**.

The counselling and psychological guidance department conducts separate psychosocial assessments for both the child who has been harmed and the child who engaged in the harmful behaviour.

Interventions are planned on the basis of approaches that set clear boundaries, support the child in taking responsibility and promote restorative practice, rather than relying on punitive measures.

5.6.5. Protective and Supportive Measures for the Child Who Has Been Harmed

Arrangements that support the child's sense of safety within the school environment—including seating arrangements, break times and classroom interactions—are planned collaboratively by the counselling and psychological guidance department and school leadership.

The support process is managed in a manner that does not result in the child being labelled as a "victim", while maintaining confidentiality and privacy.

Where the child's psychological support needs cannot be adequately met through the school's available resources, the child may be referred to appropriate external mental health services with parental notification and consent.

Depending on the circumstances experienced by the child, psychoeducation may be provided to people in the child's immediate environment, including parents where the family is not the source of the harm, and teachers, regarding appropriate ways of responding to the situation.

5.6.6. Intervention for the Child Who Engaged in Harmful Behaviour

For the child who engaged in harmful behaviour:

- It is clearly and explicitly communicated that the behaviour is unacceptable.
- Age- and developmentally appropriate boundaries and a behaviour support and regulation plan are developed.
- Counselling and guidance support is provided.

- Age-appropriate work is undertaken to develop the child's awareness of boundaries, empathy and impulse-control skills.
- Disciplinary procedures may be initiated where necessary, in accordance with relevant school policies.
- The aim is not to label the child, but to support the child in taking responsibility for the behaviour and making positive changes.

5.6.7. Informing Parents / Guardians

- The parents / guardians of both the child who has been harmed and the child who engaged in harmful behaviour are informed at an appropriate stage of the process.
- Information is shared in accordance with confidentiality requirements, without bringing the parties into direct confrontation and while protecting the privacy of other children involved.
- Support and monitoring plans are implemented in cooperation with parents / guardians.

5.6.8. Reporting to External Agencies

External agencies are notified in the following circumstances:

- Where the behaviour constitutes sexual abuse
- Where there is serious physical harm, including any physical harm requiring medical intervention or resulting in a prolonged recovery period, or where threats are involved
- Where conduct in a digital environment may constitute a criminal offence
- Where the child's safety cannot be adequately ensured through the school's available resources

Such notifications are made in accordance with legal obligations and under the coordination of the CPO and school leadership.

5.6.9. Record-Keeping, Monitoring and Review

- All processes are documented in writing.
- Measures taken and support provided are monitored regularly.
- Where incidents recur or the level of risk increases, the process is reassessed.
- Anonymised learning outcomes are generated to inform preventive work across the school.
- Counselling and psychological guidance records are maintained separately from child protection records.

Guidance records relating to the child protection process are limited to information directly relevant to the child's safety and the intervention process. Therapeutic content, detailed accounts of emotions or clinical assessments are not included in the child protection file.

5.6.10. Preventive Approach

Açı Schools undertakes the following measures to prevent child-on-child incidents:

Preventive Education and Awareness

- Anti-bullying programmes
- Social and emotional learning programmes addressing self-awareness, empathy and emotional regulation
- Education on digital safety, online risks and cyberbullying
- Structured curriculum addressing peer relationships, personal boundaries and the concept of consent
- Age-appropriate, rights-based child protection education

Safe School Climate and Culture

- Classroom and school-wide practices that strengthen a school climate based on respect, inclusion and trust

- A clear stance and zero-tolerance approach towards discrimination, exclusion and labelling
- Accessible and supportive environments in which students feel safe

Early Identification and Monitoring Mechanisms

- Regular training for teachers and school staff on recognising indicators of peer abuse
- Detailed transfer of observation data gathered by the counselling department regarding risk-related behaviours during handovers, in order to support early identification
- Regular sharing with the counselling department of classroom and out-of-class observations by SRÖ and advisory teachers to support the early identification of risk-related behaviours
- Systematic implementation of recording, monitoring and referral processes relating to student behaviour

Safe Reporting and Response Processes

- **Confidential and accessible reporting channels** through which students can safely report risks arising from peer relationships
- Handling and documenting reports in accordance with the Child Protection Procedure
- **Non-punitive and restorative approaches that prioritise the best interests of the child** in peer-on-peer incidents

Psychosocial Support and Guidance

- Individual counselling and guidance support for students who have experienced, witnessed or contributed to a peer-on-peer risk
- Group work, social skills development programmes and monitoring plans where necessary
- Protection of students' confidentiality and psychological safety throughout the process

Working in Partnership with Families

- Informing parents / guardians about peer bullying, digital risks and boundary violations
- Structured meetings with families where necessary
- Guidance and awareness-raising activities that strengthen school–family collaboration
- Where a risk to the child's safety and wellbeing continues and cooperation with the parents / guardians cannot be established, notification of the relevant authorities where this is in the child's best interests

Policy and Continuous Improvement

- Regular review of policies and practices relating to peer-on-peer incidents
- Ongoing professional development for school staff in child protection and peer abuse
- Documentation of all practices in accordance with the Child Protection Procedure

5.7. School Trips and High-Risk Situations

School trips, camps, fieldwork, sports tournaments, residential activities and all other activities taking place outside the school campus involve increased child protection (safeguarding) risks because children are operating outside their usual school environment. These risks may arise from reduced environmental supervision, blurred adult–child boundaries, changes in group dynamics and more limited access to emergency support.

Açı Schools adopts a preventive, planned and documented approach to ensuring children's safety during school trips and similar high-risk situations. The principles and practices set out below apply without exception.

5.7.1. Scope

This procedure applies to:

- day trips;
- domestic and international residential trips;
- camps, sports and arts activities;
- competitions, tournaments and fieldwork;
- all activities taking place outside school hours or on behalf of the school.

All activities taking place outside the school environment are subject to the same level of child protection responsibility as activities taking place within the school environment.

5.7.2. Key Safeguarding and Child Protection Principles

The following principles apply to school trips and high-risk situations.

5.7.2.1. Prohibition of One-to-One Adult–Child Situations

- Under no circumstances may an adult be alone and unsupervised with a child.
- One-to-one meetings may only take place in visible, observable and justifiable settings.
- All contact, including contact required in an emergency, must be documented and justified.

5.7.2.2. Accommodation and Room Arrangements

- Adults may not share rooms with students.
- Room arrangements must be planned with due regard to age, gender, safety and privacy.
- Adults may not enter student rooms routinely or without a clear and legitimate reason.
- In emergencies, entry into a student room must take place with the knowledge of a second adult.

5.7.2.3. Maintaining Professional Boundaries

The “trip environment”, “informality” or an “informal relationship” does not justify relaxing professional boundaries.

Physical contact, communication style and digital interactions must meet the same standards that apply within the school environment, including maintaining appropriate physical distance and contact and refraining from offensive, humiliating or degrading language.

5.7.3. Safeguarding Risk Assessment

A Safeguarding Risk Assessment must be prepared for every school trip or high-risk activity. The Child Protection Risk Assessment Form is provided in **Appendix 4**.

5.7.3.1. Scope of the Risk Assessment

The risk assessment includes, but is not limited to, the following areas:

- Physical safety of the location and access control
- Transport and transfer arrangements
- Adult–student ratios
- Accommodation conditions
- Access to healthcare services
- Digital and online risks
- Group dynamics and known or previous risks
- Students with additional needs, including health, behavioural or psychosocial needs

5.7.3.2. Approval and Updating

- The risk assessment is prepared before the trip.

- It is reviewed by the CPO and school leadership.
- The assessment is updated when circumstances change.

5.7.4. Roles and Responsibilities of Adults on Duty

5.7.4.1. General Responsibilities

All adults participating in the trip:

- must be informed in advance about the Açı Schools Child Protection Policy and this Operating Procedure for School Trips and must comply with these requirements.

Being informed means that the adult is considered to have been made aware of the relevant rules and to have accepted their responsibilities.

- must read and understand the trip-specific Safeguarding Risk Assessment and comply with the measures set out in it.

Any conduct that breaches the requirements of the risk assessment is considered a child protection violation.

- must maintain professional boundaries in all communication and interactions with children.

Physical contact, one-to-one interactions, digital communication, language and conduct must fully comply with the child protection standards applicable within the school environment. The “trip environment”, a “close personal relationship” or “practical convenience” cannot be accepted as justification for a boundary violation.

- must report any concern, suspicion or unusual situation relating to a child’s safety or wellbeing without delay.

This obligation includes situations involving reasonable suspicion, even where certainty has not been established. Failing to report, delaying a report or disregarding a situation may be considered a breach of child protection responsibilities.

- must not attempt to resolve, investigate or confront parties involved in a situation arising during the trip independently.

All reports must be referred to the authorised persons through the established child protection processes.

5.7.4.2. Trip Leader

The Trip Leader is the primary on-site implementer and coordinator of child protection and safeguarding practices throughout a school trip or high-risk activity. This role involves direct responsibility for children's safety in addition to organisational responsibilities.

The Trip Leader:

- has primary responsibility for ensuring the full implementation of the Child Protection Policy and this Operating Procedure throughout the trip.

All practices on site must comply with the policy and procedure.

- is responsible for ensuring that all adults participating in the trip understand their child protection responsibilities and act accordingly.

Where necessary, the Trip Leader provides reminders, intervenes immediately in inappropriate behaviour and documents the situation.

- ensures that all concerns and allegations relating to adults, including concern, low-level concern and allegation, as well as peer-on-peer incidents arising during the trip, are reported without delay and referred through the appropriate channels.

Reports must not be delayed, disregarded or shared with unauthorised individuals.

- coordinates emergency responses with the child's safety as the priority.

This includes communication with school leadership, the CPO, healthcare providers and other relevant authorities or agencies where necessary.

- does not conduct an independent investigation, attempt to collect evidence or confront parties during a crisis.

All interventions are conducted in accordance with established child protection processes.

- ensures that child protection (safeguarding) records relating to the trip are maintained and that the necessary post-trip review is conducted.

Observations, measures taken and incidents that occur are documented in writing.

5.8. Health, Medication and Additional Needs Protocols

5.8.1. Health Information

- Students' health information, allergies and regular medication are collected in writing before the trip.
- Such information may only be accessed by authorised individuals.

5.8.2. Medication Management

- Medication is stored and administered in accordance with the school's designated health protocol.
- Students may self-administer medication only with written parental consent and in accordance with school procedures.

5.8.3. Emergencies

- The nearest healthcare facilities and emergency contact information are identified in advance.
- Emergency plans are shared with all adults responsible for the trip.

5.9. Digital Safety and Image Sharing

- During school trips and high-risk activities, adults may not engage in individual, private or confidential digital communication with students. Adults may communicate with students only through official and transparent communication channels designated by the school.

- Personal social media accounts, private telephone numbers or personal messaging applications, including WhatsApp, Instagram, Snapchat and SMS, may not be used to communicate with students.

- Digital communication must be limited to information and organisational matters relating to the trip and must be conducted on a group basis within a professional framework in terms of timing, language and tone.

- Any individual digital communication that is unavoidably required due to an emergency must be documented without delay once the emergency has ended and reported to the CPO.

- Photographs and videos may only be taken in accordance with the school's relevant policies and written parental permissions. No visual recording may be made beyond the scope of the permission granted.

- Images that may compromise students' privacy or depict students in a humiliating, inappropriate or out-of-context manner must not be taken. Students' dignity and safety must be protected at all times.

- Students may under no circumstances be photographed or recorded in bathrooms, changing areas, dormitories or other private spaces.

- All photographs and videos taken must be stored only on the school's authorised digital systems. They may not be retained permanently on personal devices.

- Images may only be shared through the school's official communication channels, by authorised individuals and for predefined purposes.

- Unauthorised sharing of images through social media, personal messaging applications or third parties is strictly prohibited.

- Any conduct that breaches the rules governing digital communication or the recording/sharing of images is assessed, depending on its nature, as a **low-level concern** or an **allegation against an adult**, and the relevant child protection processes are initiated.

- The purpose of these rules is to protect children's privacy, establish safe boundaries in digital environments, ensure transparency in adult–child relationships and prevent potential risks.

5.10. Reporting, Intervention and Crisis Management

During a trip, whenever any of the following is identified:

- Concern
- Low-level concern
- Allegation against an adult
- Peer-on-peer incident

the school's child protection procedures apply in full. The fact that the situation occurs during a trip does not justify delaying these processes.

5.11. Record-Keeping, Monitoring and Post-Trip Review

- All child protection (safeguarding) related situations are documented.
- A post-trip review is conducted.
- Identified risks are used as improvement data to inform future activities and organisational planning.

5.12. Preventive and Educational Approach

Açı Schools aims to create a safe environment during school trips through:

- pre-trip student briefings;
- child protection (safeguarding) reminders for adults responsible for the trip;
- clear and written rules.

5.13. Data Management and Record-Keeping

At Açı Schools, the reliability, traceability and legal sustainability of all child protection processes are directly linked to the quality, security and proper management of the records maintained. Data management and record-keeping are therefore regarded not merely as an administrative requirement, but as a **critical child protection practice**.

- Records relating to all child protection processes at Açı Schools are maintained systematically to ensure children's safety, enable interventions to be traced and support institutional accountability.

- Child protection records include reports relating to concerns and allegations against adults, including concern, low-level concern and allegation; peer-on-peer incidents; child protection records relating to school trips and high-risk situations; decisions made; interventions implemented; monitoring notes; meetings with parents / guardians; notifications to external agencies; and relevant correspondence.

- Responsibility for the management of all child protection records rests with the Child Protection Officer (CPO). The CPO ensures that records are accurate, complete, timely and maintained in accordance with this procedure.

- Where the CPO is unavailable, this responsibility is assumed by the Deputy Child Protection Officer.

- Other school leaders and staff may not independently create child protection records. They may only provide information to the CPO within the scope of their responsibilities. School leadership is responsible for monitoring these records and ensuring that the process is managed appropriately.

- Records must be based solely on factual observations, information reported directly and decisions taken. Assumptions, personal opinions, diagnoses or judgemental statements must not be included in records.

- Child protection records are not anonymised. The identifying information of children and adults involved in an incident is retained to ensure traceability and enable recurring incidents or patterns to be identified.

- Counselling and psychological guidance records are maintained separately from child protection records.

Guidance records relating to the child protection process are limited to information directly relevant to the child's safety and the intervention process. Therapeutic content, detailed accounts of emotions or clinical assessments are not included in the child protection file.

- Child protection records are classified as highly confidential. Access is restricted to individuals who require access as part of their role, based on the **need-to-know principle**.

- Unauthorised access, sharing, reproduction or discussion of records with unauthorised individuals is strictly prohibited.

- Physical records are stored in locked and access-restricted areas, while digital records are stored in encrypted and access-controlled systems.

- Record retention periods are determined in accordance with applicable legislation, international child protection (safeguarding) standards and Açı Schools' institutional policies.

- The retention period for child protection records is determined in accordance with applicable data protection legislation, including KVKK/GDPR, international safeguarding standards and institutional policies. Within this framework, it is recommended that child protection records generally be retained until the individual reaches the age of 25, and in serious cases such as sexual abuse, until the age of 75.

- Any loss, damage or unauthorised access to records must be reported to the CPO immediately and the necessary security measures must be implemented.

- Child protection records are reviewed periodically by the CPO. Recurring incidents, risk patterns and areas requiring improvement are assessed together with school leadership.

- Records are used to improve child protection policies and procedures, identify training needs and plan preventive measures.

- Data used for training and awareness activities is anonymised so that it does not contain personally identifiable information.

- Child protection records are not used to label or accuse individuals. They are used solely for the protection of children and institutional learning.

- Where required by law or where necessary to protect the best interests of the child, records may be shared with relevant external agencies. Such sharing is conducted only under the coordination of the CPO and is documented.

- Child protection records are maintained in a manner that makes them accessible for internal and external audits and ensures that they are traceable and verifiable.

5.14. Student Support Mechanisms

Açı Schools recognises supporting students' emotional, psychological, social and academic wellbeing as a fundamental responsibility in all child protection concerns, risk situations and intervention processes.

Priority is given to access to counselling and psychological guidance services for all students involved in child protection processes or assessed as being at risk. Support is planned in accordance with the student's age, developmental level and individual needs.

Counselling and psychological guidance support may include:

- individual meetings;

- group work where necessary;

- monitoring and review meetings.

All support processes are conducted in accordance with confidentiality principles.

Following child protection cases involving a crisis or high level of risk, the counselling department develops a monitoring plan. The plan may include areas such as school attendance, emotional regulation, the child's perception of safety and academic functioning.

The monitoring process is structured in a way that does not result in the student being labelled as being "continuously at risk". Where the student's needs cannot be adequately met through the school's available resources, referral to external specialists may be made with parental notification and consent. Such referrals are coordinated by the CPO and the counselling department.

At Açı Schools, a Buddy (peer support) system is implemented to ensure that students do not feel isolated and are able to develop safe social connections. The system is structured particularly for new students, students experiencing transition periods or students identified as requiring additional support.

The Buddy system is based on:

- matching students with due regard to age and developmental level;
- ensuring that peer support takes place under adult supervision;
- providing support while maintaining appropriate professional boundaries.

The Buddy system does not transfer child protection responsibility to students. It is structured solely as a supportive social mechanism.

A structured child protection curriculum is implemented across the K–12 continuum. The curriculum aims to help students understand their own safety, recognise their personal boundaries and develop the skills needed to seek help through age-appropriate content.

Within the child protection curriculum, students are taught, in developmentally appropriate ways, about:

- personal boundaries and consent;
- safe and unsafe behaviour;
- ways of accessing trusted adults;
- bullying and responding to peer-on-peer incidents;
- recognising and expressing emotions.

Online safety and digital boundaries education for students is an integral part of the child protection curriculum. These programmes aim to develop awareness of risks that may be encountered in digital environments.

Online safety education covers:

- cyberbullying;
- online harassment and grooming;
- privacy and personal data security;
- setting boundaries and seeking help in digital environments.

These topics are delivered through age-appropriate content.

- Students are regularly informed about the availability of support mechanisms. They know how and when to approach the counselling department, their teachers or the CPO.
- All support mechanisms are implemented through an approach that does not blame or label the student and that prioritises the best interests of the child.
- Student support processes are monitored and updated where necessary. Support plans are revised in response to changes in the student's wellbeing.

5.15. Working in Partnership with Families

- Açı Schools recognises families as important stakeholders in child protection processes and adopts school–family collaboration as a fundamental principle in supporting children's safety and wellbeing.
- Families are regularly informed about the Child Protection Policy and Operating Procedure. Such information may be provided through parent meetings, seminars, written communications and digital communication channels.

Awareness and information activities are structured to cover:

- the school's approach to child protection;
- the roles and responsibilities of families;
- potential areas of risk and early warning signs.
- Communication with families is conducted in accordance with the principle of transparency. However, transparency is balanced with confidentiality and the best interests of the child. Not all information, under all circumstances and in every detail, is shared.
- Information shared with families during child protection processes is planned and communicated in a way that:
  - does not place the child's safety at risk;
  - protects the privacy of other children and adults;
  - remains within legal boundaries.
- Parents / guardians are informed when a concern or risk relating to their child is identified, at an appropriate time and with appropriate content. Communication is conducted using language that is calm, non-accusatory and solution-focused.
- Meetings with families are conducted and documented where necessary under the coordination of the counselling and psychological guidance department, the CPO and school leadership.
- Açı Schools conducts awareness-raising and capacity-building activities for families. These may include:
  - children's personal boundaries and consent;
  - digital safety and online risks;
  - bullying and child-on-child incidents;
  - healthy communication with children.

- Awareness activities aim to support families in participating actively and knowledgeably in child protection processes. They do not place sole responsibility for child protection on families.

- Reports, questions or concerns raised by families are taken seriously and assessed in accordance with the Child Protection Procedure. Families are encouraged to raise concerns.

- While working collaboratively with families during child protection processes, the school's professional responsibilities remain with the school. Families are not expected to direct the process, conduct investigations or make decisions on behalf of the school.

- Where necessary, families may be informed about or referred to external support mechanisms, specialists or relevant agencies in the best interests of the child.

- Collaboration with families is conducted on the basis of trust and mutual respect, with the best interests of the child at the centre.

- In the event of an incident, the parents / guardians of students involved in the incident are expected not to communicate directly with one another. Likewise, parents / guardians must not communicate directly with the other student involved. All communication and information-sharing processes are conducted exclusively through school leadership.

5.16. Staff Training

- All academic and administrative staff working at Açı Schools are required to act with the understanding that child protection is not the responsibility of only designated individuals, but of every adult working within the school. This understanding is supported through structured and continuous training.

- Annual mandatory child protection (safeguarding) training is provided to all staff working at the school. Attendance is compulsory and is documented.

- Where there are changes in Administrative Affairs staff, the necessary information is provided, and training is delivered to staff who subsequently join the organisation. The school to which the new staff member is assigned, the scope of their duties and other relevant details are communicated by Administrative Affairs to school leaders.

- Annual child protection training provides staff with current and practical content covering:

  - types of child abuse and neglect;

  - early warning signs;

  - the distinctions between concern, low-level concern and allegation against an adult;

  - reporting responsibilities and appropriate reporting procedures;

  - professional boundaries and ethical conduct.

- The professional boundaries and behavioural responsibilities that staff are required to observe under child protection requirements are also addressed separately in the employment contract signed with Açı Schools under the heading **"TEACHER'S BEHAVIOURAL RESPONSIBILITIES"**. The provisions relating to behaviours that must be undertaken or avoided under the Child Protection Procedure are included in **Appendix 5**.

- All newly appointed staff must complete mandatory child protection induction training before commencing their duties. Staff may not begin working directly with children until this training has been completed.

- During induction, new staff are clearly and comprehensively informed about:

  - the Açı Schools Child Protection Policy and Operating Procedure;

  - reporting mechanisms and designated responsible persons;

  - professional boundaries and digital communication rules.

- Staff training is not limited to general awareness and is supported by modules addressing specific areas of risk. These include, in particular:

  - child protection during school trips and residential activities;
  - digital safety and online risks;
  - the low-level concern approach and early intervention.

- Staff participating in trips, camps or high-risk activities are required to receive trip-specific child protection (safeguarding) briefing before the activity.

- A document is also required to be signed by third parties who are not employees of the school. This document is included as **Appendix 2** in the documentation provided to the tourism company. It applies to shadow teachers, interns and all other staff and is valid for trips, tournaments and all other off-site school activities.

- Training may be delivered face-to-face, online or through blended models. However, the content must be current, clear and practice-oriented.

- Training attendance is monitored by Human Resources, the CPO and school leadership. Any incomplete participation is followed up and completion is ensured.

- Child protection training is designed not to be accusatory towards staff, but to be supportive, awareness-raising and empowering.

5.17. Safer Recruitment

Safer recruitment is a fundamental component of the preventive approach to child protection. Açı Schools is committed to conducting recruitment processes for all positions involving direct or indirect contact with children in a manner that prioritises children's safety, wellbeing and best interests. This procedure aims to prevent unsuitable individuals from entering environments in which they may work with children and to establish a safe school ecosystem.

5.17.1. Advertising and Pre-Application Preparation

All job advertisements published by Açı Schools clearly state the organisation's zero-tolerance approach to child protection.

Job advertisements specify:

- the level of direct, indirect or limited contact the position involves with children;
- the child protection responsibilities associated with the position.

At the application stage, candidates are expected to provide:

- criminal record documentation;
- an up-to-date CV;
- details of at least three professional referees;
- an employment and role history screening form.

The advertising and pre-application process aims to make clear to candidates that working with children carries a high level of responsibility.

5.17.2. Application and Initial Screening

- All applicants are expected to submit complete documentation.
- Any gaps in employment history, changes in roles or short periods of employment must be explained in writing.
- Unexplained gaps or inconsistencies are considered potential indicators of child protection risk and are subject to detailed review.
- The initial screening process considers not only professional qualifications, but also the candidate's ethical conduct, reliability and suitability for working with children.

5.17.3. Interview Process

- All interviews are conducted by at least two authorised individuals. Single-person interviews are not permitted.

- During the interview process, candidates are asked behavioural and situational questions focused on child protection. These questions cover areas such as professional boundaries, power dynamics, ethical dilemmas and appropriate responses to situations involving risk.

- The candidate's awareness of child safety, approach to boundary violations and understanding of reporting responsibilities are assessed.

- Interviews are documented through written notes, which are added to the recruitment file.

5.17.4. Reference Checks

- At least three professional references are requested from the candidate. Family members and personal references are not accepted. Candidates are expected to provide references from direct managers at organisations where they have previously worked.

- Candidates who do not provide any former manager as a referee are treated, in accordance with child protection and safer recruitment principles, as presenting an indicator of risk requiring additional assessment. Such cases are subject to detailed review during the recruitment process.

- Reference checks are not limited to written statements. Face-to-face or online verification is preferred; where this is not possible, direct verification is conducted by telephone.

Referees are asked direct and specific questions concerning:

- the candidate's experience of working with children;

- their ability to maintain professional boundaries;

- their history of ethical and safe conduct.

- Reference interviews are documented in writing and retained in the recruitment file.

5.17.5. Background Checks

Açı Schools conducts the following checks according to the nature of the position and level of contact with children:

- criminal record and archived criminal record checks in accordance with the legislation of the Republic of Türkiye;

- where necessary, or for candidates with international work or residence history, international background checks in accordance with the legislation of the relevant country;

- social media and digital footprint checks using publicly available sources, where relevant, for ethical and professional suitability;

- background checks are conducted in a manner that does not unduly intrude upon the candidate's private life while assessing reasonable risks relevant to child safety.

5.17.6. Decision and Commencement of Employment

A candidate may not commence employment until all assessment and screening processes have been completed fully and satisfactorily.

Mandatory child protection and safeguarding training is provided before the start of employment or on the first working day. The Açı Schools Child Protection Policy and Operating Procedure are provided to the candidate. The candidate's signed acknowledgement confirming that the policy and procedure have been read and accepted is obtained.

A new staff member may not have direct contact with children until child protection induction has been completed.

5.17.7. Ongoing Monitoring

Safer recruitment at Açı Schools is not regarded as an activity limited to the point of recruitment. Staff compliance with child protection principles and standards is monitored throughout their employment through regular training, observations and records.

Where a concern or allegation relating to an adult arises during employment, application documents, reference checks and background screening obtained during recruitment may be considered as part of the relevant review in order to support a comprehensive assessment of the situation.

5.18. Monitoring, Evaluation and Revision

The Açı Schools Child Protection Policy and Operating Procedure is treated as a dynamic document that is reviewed and adapted in response to changing needs, legal requirements and learning from practice. Accordingly, the procedure is systematically reviewed at least once a year.

The review process is coordinated by the Child Protection Officer (CPO), with contributions from school leadership, the counselling and psychological guidance department and other relevant stakeholders where necessary. The process considers situations encountered in practice, records, risk patterns, audit findings and changes in legislation or regulatory requirements.

When evaluating the effectiveness of the procedure, the following are taken into consideration:

- records relating to concerns and allegations against adults, including concern, low-level concern and allegation;
- experiences arising from school trips and high-risk situations;
- feedback from staff, students and parents / guardians;
- outcomes of training and awareness-raising activities.

Feedback is considered for the purpose of systemic improvement rather than on the basis of individual incidents.

Where updates are required as a result of the review, they are incorporated into the procedure in a clear and traceable manner. Updated policies and procedures are communicated through appropriate channels to all relevant stakeholders, including academic and administrative staff, students and parents / guardians.

Following updates, information and training activities are planned where necessary to ensure that all stakeholders understand the changes and apply them appropriately. This approach aims to ensure that child protection practices are not confined to written documents but become embedded throughout the school culture.

5.19. Reporting Obligations under the Turkish Criminal Code

Pursuant to Article 278 of the Turkish Criminal Code (TCK) and other relevant provisions, failure to report cases of abuse and neglect constitutes a criminal offence. Staff acknowledge this responsibility and are required to fulfil their reporting obligations.

5.19.1. Protection of Personal Data (KVKK) and Exception to Confidentiality

Where the best interests and life safety of the child are at stake, information may be shared with judicial and administrative authorities. Such sharing is carried out solely within the scope of legal obligations and child protection requirements.

5.19.2. Protection Against Defamation and the Right to Protection from Unjust Stigmatisation

During an investigation, individuals who make a report based on a good-faith and reasonable suspicion are protected. However, knowingly and intentionally false allegations are subject to the applicable general legal provisions.

Throughout the investigation process, the **presumption of innocence** and the **right to protection from unjust stigmatisation** are respected.

5.19.3. Procedure for Coordination with Judicial Authorities

Where a risk is identified, the Child Protection Office (CPO) and/or the School Lawyer work in coordination with the relevant law enforcement authorities, including the Child Protection Unit, the Public Prosecutor's Office, the Provincial Directorate of Family and Social Services and relevant healthcare services, and all necessary procedures are implemented.

This coordination process is established as the **"Legal Contact Flow"** and is communicated to all staff.

6. APPENDIX

1.

AÇI SCHOOLS– 2026–2027 CHILD PROTECTION TEAMS

AÇI ANATOLIAN HIGH SCHOOL – BAHÇEKÖY	
Child Protection Officer (CPO) and School Principal	Tuğba Sayan Debran
Deputy School Principal	Müge Arviş Karatepe
Deputy School Principal	-
School Counsellor	Ayça Tuna
School Counsellor	-
School Counsellor	-
School Psychologist	Berfin Burçak Kaya Eldut
School Nurse	Selda Özvarış
Legal Counsel	Hülya Önder
Teacher/Staff Representative	Aslı Hacımuto
	Meltem Dedeoğlu Öz
	Fulya Erim

AÇI SOCIAL SCIENCES HIGH SCHOOL – BAHÇEKÖY	
Child Protection Officer (CPO) and School Principal	Tuğba Sayan Debran
Deputy School Principal	Merve Aktaş
Deputy School Principal	-
School Counsellor	Yağmur Nur Büyüktarım
School Counsellor	-
School Counsellor	-
School Psychologist	-
School Nurse	Selda Özvarış
Legal Counsel	Hülya Önder
Teacher/Staff Representative	Meltem Dedeoğlu Öz
	İpek Saltoğlu
	İdil Kalpak

BAHÇEKÖY AÇI MIDDLE SCHOOL	
Child Protection Officer (CPO) and School Principal	Tuğba Sayan Debran
Deputy School Principal	Kübra Şencan
Deputy School Principal	-
School Counsellor	Kübra Çelik
School Counsellor	-
School Counsellor	-
School Psychologist	-
School Nurse	Selda Özvarış
Legal Counsel	Hülya Önder
Teacher/Staff Representative	Begüm Akgün
	Fulya Okkan
	Burcu Geçici

SARIYER AÇI MIDDLE SCHOOL	
Child Protection Officer (CPO) and School Principal	Aslı Arık Yavaş
Deputy School Principal	Gülşah Gül
Deputy School Principal	Semra Altındal
School Counsellor	Cansu Şipal Erdoğan
School Counsellor	Zehra Akıncı
School Counsellor	Duygu Tarhan
School Psychologist	Elif İrem Kunduracı
School Nurse	Ece Kuraloğlu
Legal Counsel	Sema Yörükoğlu
Teacher/Staff Representative	Hülya Önder
	Eda Özden
	İrem Aktürk

SARIYER AÇI PRIMARY SCHOOL	
Child Protection Officer (CPO) and School Principal	Ela Korkmaz
Deputy School Principal	Gülşen Kartal
Deputy School Principal	-
School Counsellor	-
School Counsellor	-
School Counsellor	Esra Özen
School Psychologist	Çağdaş Şeker
School Nurse	Aleyna Güney
Legal Counsel	Hülya Önder
Teacher/Staff Representative	Elif Oktay
	Başak Şeref
	Ekin Tokatlı

AKATLAR AÇI PRIMARY SCHOOL	
Child Protection Officer (CPO) and School Principal	Gülnur Gürsoy
Deputy School Principal	Burcu Güleç
Deputy School Principal	-
School Counsellor	Fulya Alata
School Counsellor	-
School Counsellor	-
School Psychologist	Yeliz Kartal
School Nurse	Rabia Nalbant
Legal Counsel	Hülya Önder
Teacher/Staff Representative	Şeyma İşbilen
	Sema Karalar
	Hande Özçelik

LEVENT AÇI PRESCHOOL	
Child Protection Officer (CPO) and School Principal	Kristin Leda Olgundemir
Deputy School Principal	-
Deputy School Principal	-
School Counsellor	Elif Kaçar
School Counsellor	-
School Counsellor	-
School Psychologist	-
School Nurse	Derya Dağlı
Legal Counsel	Hülya Önder
Teacher/Staff Representative	Eda Asil
	Nazlıdeniz Topsakal

BAHÇEKÖY AÇI PRESCHOOL	
Child Protection Officer (CPO) and School Principal	Roz Gençoğlu
Deputy School Principal	-
Deputy School Principal	-
School Counsellor	Ceren Apaydın
School Counsellor	-
School Counsellor	-
School Psychologist	-
School Nurse	Gizem Sarı
Legal Counsel	Hülya Önder
Teacher/Staff Representative	Tuğçe Asilazmaz
	Selin Oğuzoğlu
	Neslihan Ulukan

2.

AÇI SCHOOLS – CHILD PROTECTION STATEMENT FOR EXTERNAL ORGANISATIONS AND INDIVIDUALS

At Açı Schools, the safety and wellbeing of our students are our highest priority at all times. Protecting children is a fundamental responsibility of our school, both on and off campus and throughout all school-related activities. This statement sets out the principles and expectations governing communication and interaction with our students under the age of 18. Our aim is to ensure a safe environment for both our students and all individuals and organisations working with the school.

In all activities involving our students, a designated representative of Açı Schools will be informed of all communication and interaction with students and, where necessary, will be present and involved in the process.

Thank you for your commitment to supporting our students' development and contributing to a safe and supportive learning environment in all your interactions with them.

All organisations and individuals working in partnership with Açı Schools are expected to comply with the following principles:

1. Protection of Children

- The physical, emotional and social safety and wellbeing of our students are our highest priority.
- Any form of physical or emotional abuse, neglect, violence, bullying, discrimination, or any other behaviour that may compromise a child's dignity, safety or wellbeing is strictly prohibited and will not be tolerated under any circumstances.

2. Communication and Professional Boundaries

- The relevant representative of the external organisation or individual will provide written confirmation that they consent to their professional email address being shared with students, where applicable.
- Communication with students must take place only through channels authorised by Açı Schools and through official school-approved communication channels. Personal accounts must not be used to communicate with students.
- Personal telephone numbers must not be shared with students, and communication via personal social media accounts is not permitted.
- A school representative must be present during face-to-face meetings with students. Students must not be left alone with an external individual.

3. Confidentiality and Data Protection

- No personal information, photograph or video relating to students may be recorded, stored, reproduced or shared without appropriate authorisation.
- Students' images and personal information may only be used with the prior written authorisation of the School Leadership.

4. Reporting Concerns

- Any situation that may place a student's safety or wellbeing at risk must be reported immediately to the School Leadership at Açı Schools.

5. Legal and Ethical Responsibilities

- All activities must be conducted in accordance with the laws of the Republic of Türkiye and Açı Schools' Child Protection Policy.

If you feel uncomfortable about any situation, believe that a student may be at risk, or have any questions or concerns relating to child protection, please contact one of the following members of the school community:

…….. – School Counsellor

Email: [email address] / Telephone: [telephone number]

…… – Deputy School Principal

Email: [email address] / Telephone: [telephone number]

…… – School Principal

Email: [email address] / Telephone: [telephone number]

By signing this statement, the undersigned acknowledges, accepts and undertakes to comply with the principles and requirements set out above in all work and activities carried out in collaboration with Açı Schools.

Name of Organisation / Individual:

.....

Authorised Signature:

.....

Date:

.....

3.
AÇI SCHOOLS – INTERVIEW AND DISCLOSURE PROTOCOLS

When a Child Discloses Abuse or Neglect

When a child discloses abuse or neglect, the conversation must be conducted in a manner that enables the child to express themselves safely and comfortably and ensures that their account is listened to carefully.

- The conversation must take place in an appropriate setting where external influences and distractions are minimised, and where the child can feel safe and their privacy can be maintained.
- A calm, supportive and non-judgemental approach must be adopted, without making assumptions or suggesting possible answers. The child's account must be taken seriously.
- The child must not be interrupted or led through their account. They should be encouraged to speak at their own pace and should not be interrupted unnecessarily.
- Open-ended questions that allow the child to use their own words should be used in the first instance to support the child in providing their account. Questions that may lead the child, imply an answer, offer multiple possible answers, or unnecessarily prompt a yes/no response should be avoided.
- The child must not be promised that the information they disclose will remain completely confidential. Instead, the child should be informed that information will be shared, strictly on a need-to-know basis, with those responsible for safeguarding their safety and arranging any necessary support.
- Information disclosed by the child must be recorded on **Appendix 2 / Child Protection Reporting Form**, preserving the child's own words as far as possible and without adding personal interpretation, assumptions or judgements.
- Information that has been directly reported by the child or directly observed must be clearly distinguished from the recorder's own interpretation, opinion or information obtained from another person.
- The person speaking with the child must not attempt to verify the child's account, investigate the details of the incident or make their own assessment of the situation.
- Information relating to the child must not be shared with unauthorised individuals. All records must be handled in accordance with the confidentiality and record-keeping requirements set out in the Child Protection Procedure.
- Once the conversation and recording process have been completed, all relevant information and records must be passed to the **Child Protection Officer (CPO)** without delay.
- No photograph, audio recording or video recording of the child may be made. No individual involved must be accused, and no speculation about the incident should be made.

When a Staff Member Reports a Concern Regarding Suspected Abuse or Neglect

- Where a staff member has **reasonable suspicion** that a child may have experienced abuse or neglect, the staff member must report the concern to the **Child Protection Officer (CPO)** on the same day and complete the necessary records in accordance with the reporting and record-keeping procedures set out in the Child Protection Procedure.

- Where the child has not made a direct disclosure, the staff member must not attempt to investigate, verify or independently establish the basis of their reasonable suspicion, nor should they subject the child to detailed questioning.
- Where it is necessary to speak with the child, the conversation must be conducted in accordance with the principles set out in this protocol. The purpose is not to investigate the incident, but to provide the child with a safe opportunity to express themselves and to obtain the information necessary for the CPO to assess the concern and determine the appropriate next steps.
- Questions asked of the child must be limited to what is necessary to establish the relevant information. Leading, accusatory or otherwise suggestive questions that may influence the child's response must be avoided.
- The staff member must not independently interpret the child's account or behaviour, confront any of the parties involved, or contact potential perpetrators in an attempt to investigate the matter.
- Information obtained must be recorded objectively, clearly distinguishing factual information from personal interpretations and assumptions, and must be passed to the **Child Protection Officer (CPO)**.

Key Principles

In all conversations or meetings with a child, the child's **best interests, safety, privacy and wellbeing** must be prioritised. Approaches and practices that may cause further distress or **re-traumatisation** must be avoided throughout the process.

No staff member other than the **Child Protection Officer (CPO)** or a person specifically authorised by the CPO may conduct repeated meetings with the child for the purpose of establishing the facts, confronting the parties involved or carrying out a comprehensive investigation.

4.

AÇI SCHOOLS – CHILD PROTECTION AND SAFEGUARDING CHECKLIST

School Trips and Risky / High-Risk Activities

Purpose

This checklist is used to ensure that the necessary child protection and safeguarding measures are considered and implemented during the planning, delivery and evaluation of school trips, activities, competitions, tournaments, conferences, camps, events and similar activities organised by the school or in which students represent Açı Schools outside the school premises.

The checklist must be completed by the responsible team prior to the activity.

A. ACTIVITY DETAILS

Activity Name:

…….

Type of Activity:

☐ Local trip / activity

☐ Out-of-city trip / activity

☐ International trip / activity

☐ Competition / tournament

☐ Robotics / technology activity

☐ Debate / conference / academic activity

☐ Camp / residential activity

☐ Sports activity

☐ Arts / cultural activity

☐ Other: ……..

Date:

……..

Location / Country / City:

……..

Duration of Activity:

……

Number of Participating Students:

……..

Student Age / Year Group:

……..

Trip Leader / Activity Leader:

……

Teachers / Staff Members Involved:

……

External Organisation / Event Organiser / Individual:

……

B. PRE-ACTIVITY CHILD PROTECTION AND SAFEGUARDING CHECKS

1. Risk Assessment

Checklist	Yes	No	Non Applicable	Comments / Measures Taken
The suitability of the activity for the students' age and developmental stage has been assessed.	☐	☐	☐	
The setting and conditions in which the activity will take place have been assessed from a child protection and safeguarding perspective.	☐	☐	☐	
Potential physical, emotional, social and environmental risks that may arise during the activity have been assessed.	☐	☐	☐	
Necessary measures to minimise identified risks have been determined.	☐	☐	☐	
The level of risk and any additional measures required have been communicated to the responsible staff members.	☐	☐	☐	

2. Supervision and Responsibilities

Checklist	Yes	No	Non Applicable	Comments / Measures Taken
The teacher/staff member responsible for the activity has been clearly designated.	☐	☐	☐	☐
The individuals responsible for supervising students and their respective responsibilities have been clearly identified.	☐	☐	☐	☐
The student-to-teacher/staff ratio has been assessed as appropriate to the nature and level of risk of the activity.	☐	☐	☐	☐
Areas where students may be left alone or where adequate supervision may not be available have been identified and assessed.	☐	☐	☐	☐
Appropriate arrangements have been put in place to prevent students from being left alone inappropriately with teachers/ staff members or employees of external organisations.	☐	☐	☐	☐
Where necessary, roles and responsibilities and the communication chain have been clearly established	☐	☐	☐	

3. Transportation and Accommodation

Checklist	Yes	No	Non Applicable	Comments / Measures Taken
The safety of the transportation arrangements and the planned mode of transport has been assessed.	☐	☐	☐	
Student supervision arrangements and responsibilities during transportation have been clearly established.	☐	☐	☐	
Appropriate arrangements have been made to ensure that students are not left without appropriate supervision during transportation.	☐	☐	☐	
Where accommodation is required, the safety and suitability of the accommodation facility for students have been assessed.	☐	☐	☐	
Room allocation, floor arrangements and supervision arrangements during the stay have been planned.	☐	☐	☐	
Where accommodation is required, appropriate arrangements have been made to prevent students from sharing a room with adults or being left alone with adults in an inappropriate manner	☐	☐	☐	
Procedures for implementing the transportation and accommodation plan in the event of an emergency have been established.	☐	☐	☐	

4. Health and Special Needs

Checklist	Yes	No	Non Applicable	Comments / Measures Taken
Potential health risks associated with the activity have been assessed.	☐	☐	☐ ☐	
Known health needs that may affect students' participation in the activity have been taken into consideration.	☐	☐	☐	☐
Access to any necessary medication, relevant health information and medical support has been planned.	☐	☐	☐	☐
Necessary arrangements have been made to meet the needs of students with additional needs.	☐	☐	☐	☐
The healthcare provider / medical service to be contacted in the event of a medical emergency has been identified.	☐	☐	☐	

5. External Organizations and Event Stakeholders

Checklist	Yes	No	Non Applicable	Comments / Measures Taken
All external organisations and individuals involved in the activity have been identified.	☐	☐	☐	
The Açı Schools Child Protection Statement for External Organisations and Individuals has been shared with the relevant organisation(s) and individual(s).	☐	☐	☐	
Where required, the Child Protection Statement has been signed by the relevant organisation(s) and/or individual(s).	☐	☐	☐	
The manner and boundaries of communication between external organisations/individuals and students have been clearly defined.	☐	☐	☐	
Communication with students is conducted through official school-approved communication channels.	☐	☐	☐	
The requirements governing external organisations'/individuals' individual communication with students, as well as the use of photographs, videos and students' personal data, have been clearly established.	☐	☐	☐	

6. Photography, Video and Digital Security

Checklist	Yes	No	Non Applicable	Comments / Measures Taken
Rules governing the taking, use and sharing of photographs and video recordings have been clearly established.	☐	☐	☐	
Appropriate measures have been taken to protect students' personal data.	☐	☐	☐	
The access of external organisations or individuals to students' photographs, video recordings and personal data has been assessed.	☐	☐	☐	
Any digital platforms, applications or communication channels to be used during the activity have been assessed.	☐	☐	☐	

7. Emergency and Notification Process

Checklist	Yes	No	Non Applicable	Comments / Measures Taken
Emergency contacts and their contact details have been identified.	☐	☐	☐	
The communication and response procedures to be followed by those responsible for the activity in the event of an emergency have been established.	☐	☐	☐	
The procedure for contacting the Child Protection Officer (CPO) in the event of a Concern relating to a child has been established.	☐	☐	☐	
The procedure to be followed if a student goes missing or becomes separated from the group has been established.	☐	☐	☐	
Where the activity takes place abroad, the relevant emergency contact details and appropriate local points of contact and support have been identified.	☐	☐	☐	

C. DURING-ACTIVITY CHECKS

The following checks must be reviewed by the responsible teacher/staff member throughout the activity.

Checklist	Compliant	Not Compliant	Comments / Measures Taken
Student supervision is being maintained as planned.	☐	☐	
Professional boundaries between students and adults are being maintained.	☐	☐	
Communication between students and external organisations/individuals is being conducted in accordance with the established rules.	☐	☐	
Appropriate measures are being taken to prevent situations in which students may be left without adequate supervision or otherwise placed at risk.	☐	☐	
Students' physical and emotional safety is being monitored regularly.	☐	☐	
The rules governing the use of photographs, video recordings and personal data are being followed.	☐	☐	
Any new or emerging risks are being assessed and appropriate measures are being taken.	☐	☐	

Checklist	Compliant	Not Compliant	Comments / Measures Taken
Where a Concern relating to a child arises, the relevant reporting procedure is being followed.	☐	☐	

New Risk / Concern Identified During the Activity / Measures Taken:

……

D. POST-ACTIVITY REVIEW

Checklist	Yes	No	Comments
Child protection and safeguarding issues arising during the activity have been reviewed.	☐	☐	☐ ☐
Any Concerns or incidents arising during the activity have been reported and recorded in accordance with the relevant procedure.	☐	☐	☐ ☐
Any new or emerging risks identified during the activity and the measures taken to address them have been reviewed.	☐	☐	☐ ☐
Areas for improvement and measures to be implemented for future activities have been identified.	☐	☐	

Post-Activity Review / Recommendations:

……

……

E. CONFIRMATION AND ACCOUNTABILITY

I confirm that the checks set out in this form have been completed.

Activity Leader

Full Name: ……..

Role: ……

Signature: ……

Date: ……..

School Leadership

Full Name / Role: ……..

Signature: ……

Date: ……..

Additional Notes

Where the nature or level of risk associated with the activity requires an assessment beyond the checks included in this form, any necessary additional measures will be identified and the relevant information will be documented and attached to the form.

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AÇI SCHOOLS – PROHIBITED AND REQUIRED CONDUCT UNDER THE CHILD PROTECTION PROCEDURE AS SET OUT IN THE EMPLOYMENT CONTRACT

TEACHER BEHAVIOURAL OBLIGATIONS

Pursuant to the United Nations Convention on the Rights of the Child, dated 20 November 1989, and the Açı Schools Child Protection Procedure, which forms an annex to and an integral part of this Employment Contract, the Teacher hereby acknowledges, declares and undertakes that they:

- shall not engage in any conduct constituting physical abuse or physical assault against a student;
- shall not subject a student to discrimination, treat a student less favourably than other students, encourage or facilitate the exclusion or marginalisation of a student by other children, or engage in any such conduct or language;
- shall not engage in conduct that may cause a student to feel ashamed, humiliated or degraded, or that may constitute emotional abuse;
- shall not ignore illegal, dangerous or abusive behaviour or language by a student or students, and shall inform the School Leadership so that the necessary measures and disciplinary action may be taken;
- shall not use inappropriate language towards a student or students, make inappropriate suggestions, or give inappropriate, aggressive or abusive advice;
- shall not invite a student or students to their home or to any setting where they may be alone with the student or students;
- shall not invite a student or students with whom they engage in academic work to their home at any time of day, nor encourage or otherwise communicate in a manner that may lead the student or students to stay at their home;
- shall not engage in any physically inappropriate or sexually provocative behaviour towards a student or students.

Any breach of this provision shall constitute grounds for termination of the Employment Contract. Açı Schools reserves all rights to pursue any available civil and criminal legal remedies arising from such breach.