

CHILD PROTECTION POLICY

The Mouratoglou International School (referred to as MIS) endorses the Convention on the Rights of the Child, of which the host country France is a signatory and is dedicated to being a secure haven for students facing any form of abuse or neglect.

About the Policy

This policy has been informed by:

- \ Conventions on the Rights of the Child
- \ CIS - The International Task Force on Child Protection (ITFCP)
- \ Childsafeguarding.com - <https://www.csawa.re>
- \ French Law
- \ <https://eduscol.education.fr>

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MOURATOGLOU
INTERNATIONAL SCHOOL

SAFEGUARING AND CHILD PROTECTION COMMITMENT STATEMENT

At the Mouratoglou International School, we are unwavering in our commitment to ensuring the safety, well-being, and holistic development of every student. Our mission is to provide a secure environment tailored to the unique needs of each individual, empowering them to thrive academically, personally, and socially.

Guided by our values of perseverance, personalization, fulfillment, and respect, we prioritize safeguarding as the foundation for students to grow their passions, achieve excellence, and surpass themselves. We uphold a culture of kindness, diversity, and global citizenship, ensuring that every child is treated with dignity, care, and respect.

As part of our dedication to child protection, we implement robust policies, training, and practices to create a safe learning environment. Staff, families, and community members work together to support students' physical and emotional well-being, fostering confidence, autonomy, and balance.

At the core of our educational vision, inspired by the principles of high-performance sports, is the belief that hard work, discipline, and determination are nurtured best in an environment where students feel protected and valued. We are committed to empowering our students to pursue their dreams in a setting that prioritizes their safety, health, and happiness.

FROM THE OWNER AND THE HEAD OF SCHOOL

PATRICK MOURATOGLOU & JEAN-PAUL DAMIT

At the Mouratoglou International School, the safety and well-being of every child in our care is not only a priority—it is a fundamental responsibility that defines our identity as a school committed to excellence in both education and sports. As a unique institution combining high-performance tennis studies with a boarding house environment, the importance of child protection is amplified. We understand that the trust placed in us by families requires us to provide a safe, nurturing, and secure environment where students can thrive academically, athletically, and personally.

As leaders of a school that combines academic excellence with high-performance athletics, we are deeply aware of our responsibility to safeguard the students entrusted to us. Security is the foundation upon which our students build their confidence, develop resilience, and achieve greatness. The Mouratoglou site, and within the school campus is secured with cameras and gates. Along with staff (teachers, coaches, boarding house staff) a dedicated team of professionals is commissioned to uphold the highest standards of child protection. This ensures that Mouratoglou International School is a place where students are safe, supported, and inspired to excel.

INTRODUCTION

At Mouratoglou International School, we are committed to safeguarding and child protection as central pillars of our mission to create a secure and supportive environment where every student can thrive. This policy provides the framework for ensuring the safety and well-being of all students, setting clear expectations for the entire school community.

The dual nature of our school—a place of education and a home away from home—demands the highest standards of safeguarding. Our students spend significant time on campus, on the courts, in the boarding house, as well as away in tournaments, requiring vigilance at every level. Our staff is committed to a culture of safety that prioritizes both the physical and emotional security of every child in our care.

CONTEXT OF THE MOURATOGLOU ACADEMY

Each year, we welcome approximately 250 students enrolled in our academic and athletic programs, as well as several thousand campers from around the world who come to refine their tennis skills and experience something truly unique. The academy, which MIS belongs to (know, and hereinafter referred to as, “Mouratoglou Academy”) is more than just a sports school; it is a vibrant ecosystem comprising multiple complementary facilities and services.

On the Mouratoglou Academy campus, you will find:

- / A country club offering high-end facilities, including tennis courts, a swimming pool, a state-of-the-art gym, and relaxation areas for members and visitors.
- / A hotel, providing comfortable accommodation for families, trainees, and guests close to our sports facilities.
- / An international academic program, combining rigorous studies with elite tennis training, tailored to the needs of student-athletes.
- / A multicultural environment, bringing together students, coaches, and staff from over 45 countries, fostering exchange and openness.
- / A boarding structure, where students live in a safe and supportive environment, guided by a dedicated team focused on their well-being and personal growth.
- / International sports competitions and events, reinforcing the academy’s reputation as a center of excellence in tennis.

CONTEXT OF THE SCHOOL (MIS)

The Mouratoglou International School is a unique institution that combines academic excellence with elite athletic training at Europe's No. 1 tennis academy. Our campus serves a diverse, international community of students with over 45 different nationalities, many of whom reside on-site in our boarding facilities. The school environment is dynamic, with students navigating between academic studies, high-performance sports training, and communal living. This close-knit and multifaceted setting fosters growth and collaboration but also demands a heightened focus on child protection.

Located within the Mouratoglou Hotel & Resort, our school is part of a larger community that includes professional athletes, visiting guests, and staff. As such, the safety and security of students are paramount, requiring robust measures to address potential risks both on and off campus.

SCOPE OF THIS POLICY

This Child Protection and Safeguarding Policy applies to every member of the Mouratoglou International School community, including students, staff, coaches, parents, visitors, and third party providers.

Furthermore, the various codes of conduct policies for each of the departments where involved with our students (Teachers, Coaches, Boarding House and Medical), outlines the standards of conduct expected in all areas of school life, including:

- / On-campus activities:** Academic classes, training sessions, and boarding life.
- / Off-campus events:** Field trips, competitions, and other extracurricular activities.
- / Online interactions:** Digital communications, social media, and virtual learning environments.

The policy establishes clear roles and responsibilities to ensure that all adults and students understand their duty to promote and maintain a safe environment. It also provides guidelines for reporting concerns and addressing misconduct to uphold the safety and dignity of every child.

RELATED TERMINOLOGY AND DEFINITIONS

To ensure clarity and consistency, this policy includes key terminology related to child protection and safeguarding (which are provided for illustration purpose, without prejudice to their definition, meaning and scope under applicable laws):

/ Child: Refers to any individual under the age of 18.

/ Safeguarding: The proactive measures taken to ensure a child's health, safety, and well-being.

/ Child protection: Specific actions and protocols designed to prevent and respond to harm, abuse, neglect, or exploitation of children.

/ Abuse: Any form of abuse inflicted on a child, whether physical, emotional, sexual, or resulting from severe neglect. It includes any act or omission that causes, or poses a serious risk to, the child's health, safety, well-being, or development.

/ Duty of care: The legal and ethical responsibility of adults to prioritize the safety and welfare of children under their supervision.

/ Safeguarding trustee: A board member responsible for ensuring that safeguarding policies and practices are properly implemented at the governance level.

/ Strategic safeguarding lead (SSL): An individual within an organization responsible for driving the overarching vision, strategy, and implementation of safeguarding practices.

/ Designated Safeguarding Lead (DSL): The primary safeguarding officer responsible for the operational aspects of safeguarding.

/ Safeguarding Committee: A permanent governance body that provides ongoing oversight, strategy, and accountability for safeguarding policies and procedures within the organization.

/ Safeguarding Task Force: A temporary team formed to address specific safeguarding concerns, such as gathering information or implementing new safeguarding initiatives.

/ Self-harm : Self-harm is defined as the deliberate act of causing physical or emotional injury to oneself as a way to cope with overwhelming feelings, stress, or emotional distress.

/ Reporting: refers to the process of formally documenting and communicating concerns, suspicions, or incidents of abuse, neglect, exploitation, or other harm involving a child to the appropriate authorities or designated individuals within the organization.

/ MIS: Mouratoglou International School / Mouratoglou Tennis Etudes refers to the school within the Mouratoglou academy.

/ (Child in) Danger: A minor child is considered to be in danger when their health, safety, morality, or the conditions of their education, physical, emotional, intellectual, and social development are severely compromised (by reference to Article L 221-1 of the Social Action and Family Code (referencing Article 375 of the Civil Code). Every student, regardless of their social background, can be in danger or at risk of danger within their family, social, or institutional environment.

Definitions of abuse are complex and based in various cultures of child-rearing behaviors, gender and role responsibilities and expectations. The primary determination of abuse is that it is dependent on some form of a relationship that is used to meet the needs of the more powerful person, either a member of the family, a teacher, or a friend. Research guides much of the definitions that are based on understanding the impact of certain behaviors.

Children and adolescents can suffer abuse from both adults and peers.

PHYSICAL ABUSE IS:

Physical abuse refers to any non-accidental act that causes bodily or emotional harm to a child. This can include:

- / **Intentional physical injuries:** Such as bruises, burns, mutilations, or any act resulting in an impairment of physical or mental health, including the loss of bodily functions or death.
- / **Creating a significant risk of harm:** Affecting the child's physical or mental development.
- / **Cruel or inhuman acts:** Whether injuries are visible or not, including excessive punishment or behaviors that demonstrate a disregard for the child's pain or mental suffering.
- / **Violence or maltreatment:** As defined by applicable laws or the school's internal regulations.
- / **Harmful behaviors or negligence:** That result in injuries or jeopardize the child's health or development.
- / **Failure to implement preventive measures:** To protect the child against any risk of physical or mental harm.

POSSIBLE INDICATORS OF PHYSICAL ABUSE

- / UNEXPLAINED BRUISES OR CONTUSIONS, ESPECIALLY IF THEY APPEAR ON VARIOUS PARTS OF THE BODY OR DISPLAY DIFFERENT COLORS, INDICATING BOTH OLD AND RECENT INJURIES.
- / SPECIFIC INJURY MARKS IN THE SHAPE OF OBJECTS SUCH AS BELTS, ELECTRICAL CORDS, RACKETS, OR HANDS.
- / RECURRENT INJURIES FOLLOWING ABSENCES OR INCONSISTENCIES IN THE EXPLANATIONS PROVIDED BY THE CHILD OR THE RESPONSIBLE ADULT.
- / UNEXPLAINED BURNS, PARTICULARLY ON THE PALMS OR SOLES, OR CAUSED BY OBJECTS LIKE AN IRON OR CIGARETTE; IMMERSION BURNS MAY ALSO SHOW A CLEAR LINE OF DEMARCATIION.
- / LACERATIONS, ABRASIONS, OR FRACTURES WITHOUT A CLEAR OR LOGICAL EXPLANATION. UNEXPLAINED BRUISES AND WELTS ON ANY PART OF THE BODY

EMOTIONAL ABUSE IS:

A pattern of intentional verbal or behavioral actions or lack of actions that convey to a child the message that he or she is worthless, flawed, unloved, unwanted, endangered, or only of value to meet someone else's needs.

POSSIBLE INDICATORS OF EMOTIONAL ABUSE

- / **HURTFUL WORDS:** SHOUTING, INSULTING, USING DEGRADING NICKNAMES, OR MOCKING.
- THREATENING BEHAVIORS:** ISSUING THREATS, INTENTIONALLY FRIGHTENING, OR INTIMIDATING THROUGH VIOLENCE OR ABANDONMENT.
- / **ISOLATION AND REJECTION:** IGNORING, EXCLUDING, SOCIALLY ISOLATING, OR WITHHOLDING IMPORTANT INFORMATION.
- / **HUMILIATION AND DENIGRATION:** BELITTLING, EXCESSIVELY CRITICIZING, MAKING DEFAMATORY STATEMENTS, OR REPEATEDLY MENTIONING DEATH.
- / **EXCESSIVE CONTROL:** GIVING UNREASONABLE ORDERS, TREATING THE CHILD LIKE A SERVANT, OR DENYING ABUSE WHILE BLAMING THE VICTIM.
- / **EMOTIONAL MANIPULATION:** LYING, DISTORTING WORDS, OR MAKING THE CHILD FEEL LIKE A BURDEN. YELLING OR SWEARING.

NEGLECT IS:

Neglect involves failing to meet a child's essential needs, thereby compromising their physical, mental, and emotional health. It can manifest in various ways:

- / **Physical:** Lack of food, shelter, appropriate supervision, or temporary guardianship when parents are absent.
- / **Medical:** Failure to provide necessary medical care or treatment.
- / **Emotional:** Disregard for emotional needs, lack of psychological support, or tolerance of substance abuse.

POSSIBLE INDICATORS OF NEGLECT

- / CHILD IS UNWASHED OR HUNGRY
- / PARENTS ARE UNINTERESTED IN CHILD'S ACADEMIC PERFORMANCE
- / PARENTS DO NOT RESPOND TO REPEATED COMMUNICATIONS FROM THE SCHOOL
- / CHILD DOES NOT WANT TO GO HOME
- / PARENTS CANNOT BE REACHED IN THE CASE OF AN EMERGENCY

SEXUAL ABUSE IS:

According to the French Penal Code, sexual abuse of a minor is defined as any act with a sexual connotation committed against a child, without the child being able to give free and informed consent. This includes any sexual violation carried out through violence, coercion, surprise, or abuse of authority, taking into account the inherent vulnerability of minors. This includes:

- / **Non-consensual sexual acts** as defined by the penal code.
- / **Inappropriate physical contact**, such as touching a child's intimate parts, either directly or through clothing, except for legitimate hygiene or medical care reasons.

Sexual abuse has some different characteristics of child abuse that warrant special attention. While physical abuse is often the result of immediate stress and not usually planned, sexual abuse may imply planning with results that are more insidious. The planning, referred to as "**Grooming**", which results in victims accepting the blame, responsibility, guilt and shame for the sexual behavior of the offender. Sexual abuse requires far more secrecy than other forms of child abuse, so is more difficult to report.

Many victims, through the process of grooming, are taught that the sex is a form of love, so tend to love their offender and often present as happy and well-adjusted children with no negative

POSSIBLE INDICATORS OF SEXUAL ABUSE

- / SEXUAL KNOWLEDGE, BEHAVIOR, OR USE OF LANGUAGE NOT APPROPRIATE TO AGE LEVEL
- / UNUSUAL INTERPERSONAL RELATIONSHIP PATTERNS
- / VENEREAL DISEASE IN A CHILD OF ANY AGE
- / EVIDENCE OF PHYSICAL TRAUMA OR BLEEDING TO THE ORAL, GENITAL, OR ANAL AREAS
- / DIFFICULTY IN WALKING OR SITTING
- / REFUSING TO CHANGE INTO PE CLOTHES, FEAR OF BATHROOMS
- / CHILD RUNNING AWAY FROM HOME AND NOT GIVING ANY SPECIFIC COMPLAINT
- / NOT WANTING TO BE ALONE WITH AN INDIVIDUAL
- / PREGNANCY, ESPECIALLY AT A YOUNG AGE
- / EXTREMELY PROTECTIVE PARENTS

GROOMING

In the context of child protection, the term "grooming" refers to an intentional process of manipulation by which an adult, or a person in a position of authority, prepares a child for sexual abuse.

This process does not necessarily result in immediate sexual activity but involves verbal or behavioral communication aimed at establishing a relationship of trust, often by also engaging the child's parents or responsible adults to facilitate access to the child. Grooming can occur in person or online, sometimes under a masked identity.

WHAT SORT OF BEHAVIOR MAY CONSTITUTE GROOMING?

THE BEHAVIORS THAT MAY CONSTITUTE GROOMING INCLUDE, BUT ARE NOT LIMITED TO:

/ CREATING A "SPECIAL" RELATIONSHIP:

Spending excessive time with a child or showing particular attention to a specific child, making them feel unique and special.
Offering exclusive gifts or favors.
Granting special privileges, such as the ability to bypass rules.
Demanding that the relationship remains secret.
Engaging in one-on-one personal online communication.

/ TESTING BOUNDARIES:

Undressing in front of the child or encouraging inappropriate physical contact, even if not overtly sexual.
Discussing topics with sexual connotations or simulating "accidental" intimate contact.

/ MANIPULATING THE ENVIRONMENT:

Also targeting parents or guardians to gain their trust and facilitate access to the child.
Using masked identities online to further conceal their actions.
Creating an image of being reliable and trustworthy.

WHEN AN ADULT ASKS A CHILD TO KEEP ANY PART OF THEIR RELATIONSHIP SECRET, OR EMPLOYS TACTICS TO MAINTAIN THAT SECRECY, IT GENERALLY INCREASES THE LIKELIHOOD THAT THE BEHAVIOR CONSTITUTES GROOMING

PEER ON PEER ABUSE

Refers to any form of physical, sexual, emotional, or psychological abuse perpetrated by a child or young person against another child or young person.

All MIS Employees should be aware that:

/ safeguarding issues can manifest themselves via peer on peer abuse...

BULLYING – CYBERBULLYING

Harassment refers to any repeated behavior aimed at intimidating, humiliating, or isolating an individual. In the context of child protection, it includes actions or words that undermine a child's dignity or well-being, creating a hostile or degrading environment. Cyberharassment, on the other hand, involves the use of digital technologies to exert such pressure—this includes the dissemination of harmful messages, defamatory content, or threats, often anonymously. These behaviors, whether physical, verbal, or digital, are strictly prohibited and subject to disciplinary and legal measures to ensure a safe and respectful environment for all children.

POSSIBLE INDICATORS OF BULLYING OR CYBERBULLYING

/ SOCIAL WITHDRAWAL:

Reluctance to participate in school or social activities, isolation from friends, or avoidance of social interactions.

/ EMOTIONAL DISTRESS:

Increased anxiety, depression, irritability, or signs of low self-esteem.

/ BEHAVIORAL CHANGES:

Sudden shifts in mood or behavior, such as aggression, sadness, or self-harming behaviors.

/ DIGITAL SIGNS:

Secrecy about online activities, avoidance of using digital devices, or visible distress following online interactions (e.g., upset after receiving messages).

/ ACADEMIC DECLINE:

A drop in academic performance, frequent absences, or a lack of interest in school.

/ PHYSICAL SYMPTOMS:

Unexplained complaints like headaches, stomachaches, or other stress-related issues.

/ VERBAL CUES:

Expressions of feeling targeted, excluded, or repeatedly mentioning negative interactions online or in person.

SEXTING

Sexting is where they share inappropriate or explicit images/messages online or through mobile phones. 'Sexting' has become an increasingly common activity among students. It is often seen as flirting by children and young people who feel that it's a part of normal life. It is seen as a social norm by some students. 'Sexting' can leave young people vulnerable to blackmail, bullying, unwanted attention and emotional distress.

'Sexting' can be illegal. By sending an explicit image/message, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission. MIS and Mouratoglou Academy will ensure that the risks associated with this issue is discussed with children on a regular basis as part of the curriculum around responsible use of technology. Where the school becomes aware of 'Sexting' that has occurred and involves a child or children from the school, parents and relevant authorities will be notified and appropriate steps are taken.

NO TOLERANCE

No abuse should ever be tolerated or normalized. This is most likely to include but is not limited to bullying (including cyber bullying), gender based violence, grooming, inappropriate or harmful sexualised play (younger children), sexual assaults, sexting and gender issues within groups of girls and boys.

If an adult thinks for whatever reason that a student may pose a risk of harm to himself / herself or to others, the adult should report their concern to the appropriate MIS staff (see chart) as soon as possible. Should an allegation of abuse be made against another child, all children involved (whether perpetrator or victim) will be treated as being "at risk". Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, the allegation will be referred to the appropriate authorities (police, gendarmerie, etc.), as appropriate. The concern may indicate that one or more of the students concerned may be in need of additional support by local support agencies. (See section on reporting concerns).

ROLES AND RESPONSIBILITIES

MIS and Mouratoglou Academy are committed to the safeguarding and protection of children and to the prevention of child abuse in any form. We are committed to educating and supporting children on the MIS campus, and teachers in ways that develop protective behaviors, and to working with all members of the MIS and Mouratoglou Academy community to help them recognize signs of abuse and give appropriate support where necessary.

All faculty and staff employed at Mouratoglou Academy and MIS are required to report suspected incidences of physical, emotional or sexual abuse or neglect to their direct supervisor/manager or DSL. Third party providers may refer to the Facilities and Operations Manager or DSL. The DSL must report all serious concerns to the Safeguarding Trustee. The Trustee will share important information with the Board. He shall disseminate information to any other member of the Committee and the Task Force, depending on the circumstances and if necessary.

Reporting and follow up of all suspected incidences of child abuse or neglect will proceed in accordance with French law, regardless of cultural interpretation. In addition, cases of suspected child abuse or neglect may be reported to the appropriate emergency services or Government official.

DUTY OF CARE: OUR COMMITMENT TO CHILD PROTECTION

At the MIS, we recognize that safeguarding and promoting the welfare of children is a fundamental responsibility of every adult in our community. Our Duty of Care requires all staff, volunteers, and affiliated adults to act in the best interests of children, ensuring their safety, well-being, and development in a supportive and secure environment.

We are committed to upholding the highest standards of child protection by fostering a culture of vigilance, accountability, and care. This includes proactive and responsive actions to prevent harm, address concerns, and support th...

We have three primary responsibilities under our Duty of Care :

/ Safeguarding: Taking proactive measures to prevent harm by creating safe environments, implementing policies, and promoting awareness of risks to children.

/ Protecting: Reporting and recording all child protection concerns promptly and accurately, ensuring appropriate actions are taken in line with legal and organizational guidelines.

/ Supporting: Providing care and assistance to students and adults involved in child protection and safeguarding incidents, prioritizing their well-being and recovery.

Every adult within the school is empowered and obligated to act with diligence and integrity in fulfilling this Duty of Care.

At MIS, the safety, well-being, and holistic development of every student are the cornerstones of our mission. The Safeguarding Committee and Task Force are dedicated to upholding this commitment by ensuring the highest standards of protection, vigilance, and care for every child under our responsibility.

/ Implement Robust Safeguarding Policies: Ensuring policies are tailored to meet the needs of the school environment and are regularly reviewed to reflect best practices in child protection.

/ Provide Continuous Training: Equipping staff, coaches, and boarding house personnel with the skills and knowledge needed to identify, prevent, and address safeguarding concerns effectively.

/ Maintain a Secure Campus: Leveraging physical security measures, including cameras, gated access, and trained personnel, to create a safe environment both on-site and during external events such as tournaments.

/ Foster Collaboration: Partnering with families, staff, and community members to support students' physical and emotional well-being, ensuring a unified approach to safeguarding.

RESPONSIBILITY HOLDERS

SAFEGUARDING & CHILD PROTECTION COMMITTEE

SAFEGUARDING TITLE AND CONTACT DETAILS	NAME(S)	POSITION AT THE SCHOOL	RESPONSABILITIES	KEY TASKS
Safeguarding Trustee trustee@mouratoglou.com	TRUSTEE: Jean-Paul Damit	General Director of the Mouratoglou Academy & MIS	Ensures accountability and compliance with safeguarding policies at the governance level.	<ol style="list-style-type: none"> Supervises the Committee. Monitors safeguarding effectiveness. Liaison for major Child protection incidents or incidents that involve staff members or senior leaders. Reviews child protection data with the academy's board members, reports and incident handling. Ensures legal and ethical obligations are met.
	Deputy TRUSTEE Stéphanie Testard	Campus Director		
Strategy Safeguarding Lead (SSL) ssl@mouratoglou.com	SSL: Virginie Lhotel	Facilities & Operations Manager	Provides strategic oversight of safeguarding across the organization.	<ol style="list-style-type: none"> Develops and reviews safeguarding policies. Aligns safeguarding with organizational goals. Oversees risk assessments and preventive strategies Training Oversight: Ensures staff and students are trained in child protection.
	Deputy SSL : Stéphanie Anfosso	French Section Principal		
	Deputy SSL : Ana Crovetto	American Section Principal		
	SSL Training Coordinator: Aurélie Gillet	School Coordinator		
Designated Safeguarding Lead (DSL) dsl@mouratoglou.com	DSL: Alexis Catillon	Tennis & School Program Manager	Ensures operational safeguarding and child protection within the school.	<ol style="list-style-type: none"> Primary Contact: Acts as the main contact for safeguarding matters internally and externally. Incident Management: Oversees child protection reports, conduct investigations internally and refers cases to external agencies. Policy Implementation: Manages and enforces the school's child protection procedures. Data Management: Maintains confidentiality and security of child protection records.
	Deputy DSL: Candice Gohier	Sport Medicine Center Manager		

SAFEGUARDING & CHILD PROTECTION TASKFORCE

SAFEGUARDING REFERENT FOR	NAME(S) AND CONTACT DETAIL	RESPONSABILITIES	KEY TASKS
Boarding House	Stéphanie Testard	Campus Director	<ol style="list-style-type: none"> 1. Collect information from their team when a report is given. 2. Address Urgent Safeguarding Matters: Tackle specific incidents or emerging risks. 3. Implement Initiatives given by the Committee. 4. Annual review and ensure each member of their team is up to date with Child protection training
School	Ana Crovetto	American Section Principal	
	Stéphanie Anfosso	French Section Principal	
	Aurélie Gillet	School Coordinator	
Tennis / Fitness	Virgile Boissavy	Campus Director	
	Kerei Abakar	American Section Principal	
Admissions/ Program manager	Alexis Catillon	French Section Principal	
Facilities / Security	Virginie Lhotel	Facilities and Operations Manager	
Health / Medical Department	Candice Gohier	Campus Director	
	Dr Frederic Leveque	Academy Doctor	
	Catherine Gratpanche	French Section Principal	
	Sophie Maurissen	Campus Director	

DOCUMENTATION, CONFIDENTIALITY AND DATA

At MIS, the secure management of child protection information is a priority, ensuring that sensitive data is handled appropriately and accessed only by authorized personnel. This policy outlines the standards and procedures for accessing, recording, and communicating child protection data to safeguard the well-being of our students.

ACCESS TO CHILD PROTECTION DATA

Access to child protection data is strictly controlled to maintain confidentiality and protect the privacy of students.

/ Authorized Personnel: Only the Designated Safeguarding Lead (DSL), and any pertinent members of the Safeguarding Committee or staff as determined by the Trustee, with a direct role in safeguarding, may access child protection records.

/ Confidentiality: Child protection information is treated as highly sensitive. All staff are required to adhere to strict confidentiality, and unauthorized access or disclosure is treated as a serious breach of policy

/ Data Security: Child protection records are stored digitally on the school's secure DATA system under a dedicated file named "Child Protection" for each student. Access to this file is restricted, with permissions granted only to authorized personnel. All paper files will be kept secured in the Senior DSL Office.

RECORD KEEPING

The school maintains a centralized and secure system for recording and managing child protection information:

/ Incident Records: All concerns, incidents, and safeguarding actions are documented within a dedicated file in the DATA. Entries are dated, detailed, and include the actions taken to address the concern.

/ File Management: Child protection files are kept separate from academic and general student records to ensure confidentiality.

/ Retention and Disposal: Child protection records are retained for the legally mandated period, even after a student leaves the school. When no longer required, records are securely deleted or shredded.

INTERNAL AND EXTERNAL COMMUNICATIONS

Effective communication is essential for safeguarding efforts, both within the school and with external agencies:

/ Internal Communications: Safeguarding updates are shared with relevant staff members through designated channels. Access to information is on a strict need-to-know basis to protect student privacy.

/ External Communications: The school collaborates with child protection agencies, social services, law enforcement, and healthcare professionals when necessary. Any external communication is conducted in accordance with legal requirements and focuses on protecting the child.

/ Parental Engagement: While the school values transparency with parents and guardians, child protection concerns are handled with discretion. Parents are informed of safeguarding actions only when it is in the best interest of the child and complies with legal obligations.

DATA COLLECTION AND PROCESSING

MIS undertakes to comply with the applicable laws on the processing of personal data and, in particular, Regulation (EU) 2016679 of the European Parliament and of the Council of April 27, 2016 (hereinafter, «the European Data Protection Regulation»).

In order to carry out the task covered by this policy, the MIS may process the following personal data:

- / STUDENTS', STAFF'S, GUESTS' FIRST AND LAST NAMES;
- / STUDENTS', STAFF'S, GUESTS' ADDRESS;
- / STUDENTS' MEDICAL DATA (INJURIES, ILLNESSES);
- / STUDENTS' AND STAFF'S AGE.

As processor, MIS undertakes:

- / PROCESS THE DATA SOLELY FOR THE PURPOSE(S) FOR WHICH IT IS PROVIDED;
- / GUARANTEE THE CONFIDENTIALITY OF PERSONAL DATA PROCESSED UNDER THIS AGREEMENT;
- / ENSURE THAT PERSONS AUTHORIZED TO PROCESS PERSONAL DATA UNDER THIS AGREEMENT:
 - / UNDERTAKE TO COMPLY WITH CONFIDENTIALITY DUTIES OR ARE SUBJECT TO AN APPROPRIATE LEGAL OBLIGATION OF CONFIDENTIALITY;
 - / RECEIVE THE NECESSARY TRAINING IN THE PROTECTION OF PERSONAL DATA.
 - / TAKE INTO ACCOUNT, WITH REGARD TO ITS TOOLS, PRODUCTS, APPLICATIONS OR SERVICES, THE PRINCIPLES OF DATA PROTECTION BY DEFAULT.

The data collected will be communicated only to MIS' and/or MA's staff who will need to access it.

The data is kept for the duration of MIS' mission.

Data will not be transferred outside the European Union.

Persons concerned by the collection of this data may rectify it, request its deletion or exercise their right to limit the processing of their data.

REPORTING AND RESPONDING PROCEDURES

MANDATORY REPORTING

All members of the MIS Community have a duty to report concerns related to safeguarding.

The school maintains a centralized and secure system for recording and managing child protection information:

Key Principles of Mandatory Reporting:

/ Obligation to Report: Any adult who has knowledge, suspicion, or reasonable concern that a child is experiencing harm, abuse, or neglect is legally and ethically required to report it immediately, without prejudice to the applicable laws making assistance to persons in danger compulsory and punishing their violation (see articles 434-3 and 233-6 of the French Code pénal).

/ Who Must Report: This obligation applies to all staff, volunteers, visitors, and any individual engaged with the school's activities or facilities.

/ What to Report: Concerns related to physical, emotional, or sexual abuse, neglect, exploitation, or any other form of harm to a child must be reported without delay.

/ How to Report: Concerns should be reported directly to the person's direct supervisor/ manager, to the DSL or Trustee, as applicable, using the established reporting procedures. In urgent cases, concerns may also be reported to child protection authorities or law enforcement.

Confidentiality and Protection:

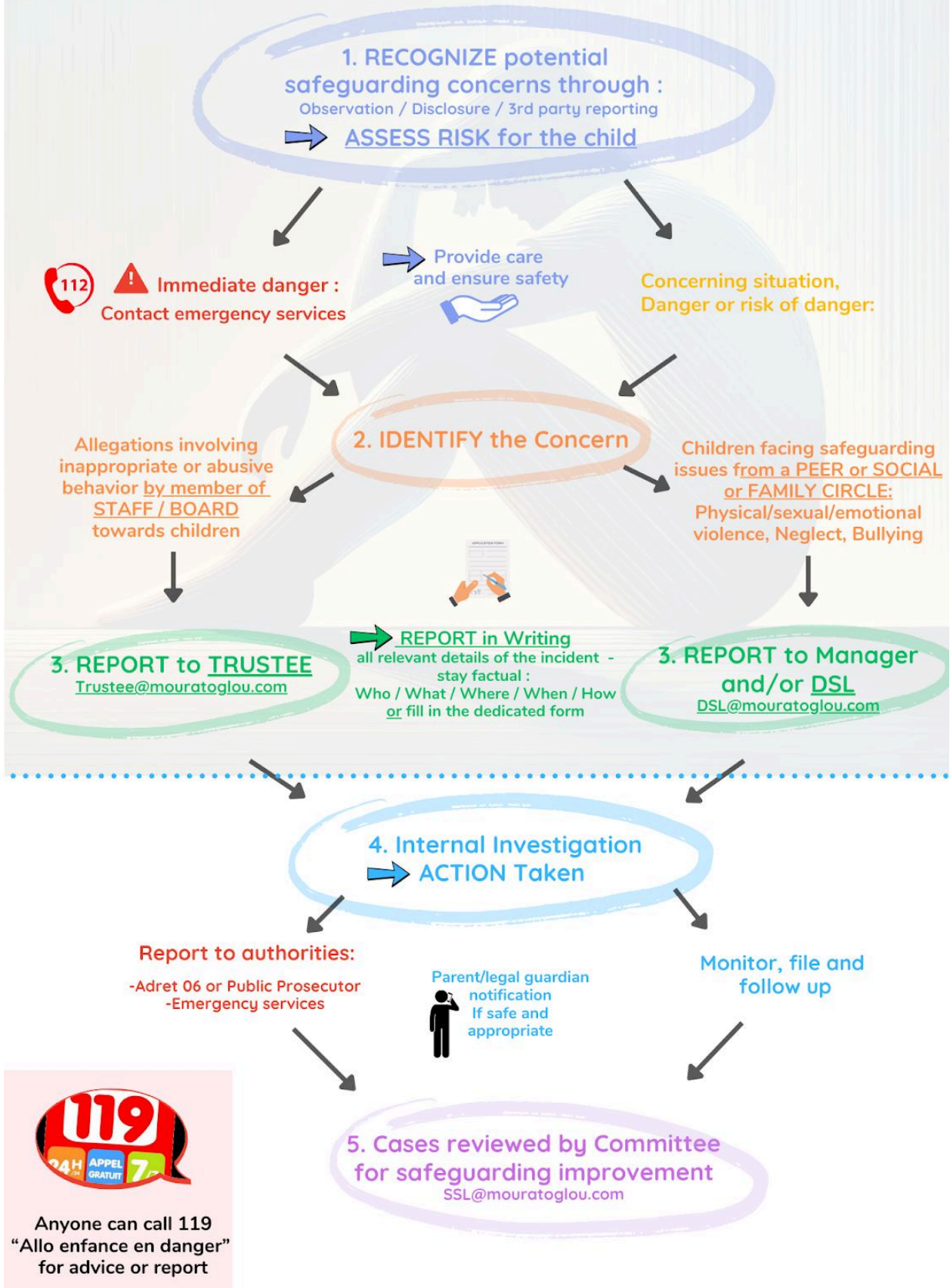
/ Reports will be handled with the utmost confidentiality, ensuring the safety and privacy of all parties involved.

/ Individuals who report concerns in good faith will be protected from retaliation or adverse consequences.

Failure to Report:

/ Neglecting to report a child protection concern can result in disciplinary action and may also have legal implications, as it puts the child at risk of further harm.

MIS INCIDENT REPORTING FRAMEWORK FOR SAFEGUARDING



INCIDENT AND REPORTING FRAMEWORK

MIS INCIDENT REPORTING FRAMEWORK FOR SAFEGUARDING

The Incident and Reporting Framework outlines the structured process for identifying, documenting, and responding to safeguarding concerns within MIS. This ensures all incidents are handled consistently, effectively, and in compliance with legal and ethical obligations.

STEPS

1. IDENTIFY CONCERN

- / Observe signs of abuse, neglect, or harm.
- / Receive a disclosure from a child or another individual.

2. ASSESS RISK FOR THE CHILD

- / Is the child in immediate danger? Yes: Call emergency services (e.g. 112) immediately. No: Proceed to the next step.

3. REPORT TO MANAGER AND/OR DSL AND DOCUMENT OBSERVATIONS

- / Record factual details (who, what, when, where, and how).
- / Fill in the MIS reporting form (p.24-25) or submit a written report.
- / Avoid interpreting or assuming motives.

4. DSL EVALUATES THE SITUATION AND INFORMS AND CONSULTS TRUSTEE

- / Conduct interview with the child and concerned third party (if applicable)
- / Provide all relevant details.
- / Decision on how to proceed taken

5. REPORT / MONITOR / FILE

- No reporting needed, apply discipline chart (if warranted), proceed to close file and monitor No Further Action: If the concern is deemed unsubstantiated, no action is taken, but the report is logged for future reference.
- Report to necessary authorities, apply discipline chart (if warranted), proceed to file and monitor

Investigation by Child Protection Agency or Police: Child services (ADRET) and/or police may intervene or collaborate with law enforcement.

6. REVIEW AND IMPROVEMENT

- / Incident handling, cases and data are reviewed by The Safeguarding Committee and shared with the Task Force (when applicable)
- / The Trustee may share informations with leaders/ board members and owners (as

ONGOING SUPPORT

- / SUPPORT THE CHILD AS APPROPRIATE WITHIN YOUR ROLE, DURING AND AFTER THE INCIDENT.
- / MAINTAIN CONFIDENTIALITY ABOUT THE REPORT.

IMPORTANT PRINCIPLES

- / **1. CONFIDENTIALITY:** ENSURE THAT ALL INFORMATION IS SHARED ONLY WITH AUTHORIZED INDIVIDUALS.
- / **2. TIMELINESS:** ACT IMMEDIATELY TO MINIMIZE RISK AND HARM TO THE CHILD.
- / **3. CLARITY:** USE CLEAR, FACTUAL DOCUMENTATION TO AVOID MISINTERPRETATION.
- / **4. ACCOUNTABILITY:** Ensure every step is tracked and aligned with organizational safeguarding policies.

WHISTLEBLOWING POLICY STATEMENT

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of children. If an employee believes that best practice in this area is not being adhered to or that practice may put students at risk, they should in the first instance report their concern to their immediate supervisor/manager. If their concern relates to a supervisor/manager, they should report their concern to the Trustee.

No employee will suffer detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures. Also, no employee, or student, may be harassed for "whistleblowing" or in any way subjected to personal or other disadvantages.

Complaints or reports made with malicious, slanderous or abusive intent, without any basis in fact, are exempt from this rule. Abuse of the right to lodge complaints or of the reporting channel will result in disciplinary measures inclu...

PERSONNEL OVERSIGHT

All personnel (employees, contracted and subcontracted staff) are required to be informed and adhere to the school's child protection policy and procedures along with the specific guides / code of conduct within their sector (i.e school, tennis, boarding house, etc...)

CODE OF CONDUCT

At MIS, we prioritize the safety, well-being, and dignity of every student. All adults interacting with students are expected to adhere to the highest standards of personal and professional conduct to ensure a safe and nurturing environment.

Refer to MIS's Child Protection Policy, the Internal Rules for employees and specific guides for each department (school, tennis, and boarding house). These are reviewed annually and shared with each staff member.

- / Employee Welcome Guide (under review)
- / Teacher's Code of Conduct (under review)
- / Coach's Code of Conduct (under review)
- / Boarding House Guide (under review)
- / MIS Responsible Use Policy – use of internet and electronic device (to be developed)

SAFER RECRUITMENT AND CONTRACTING

MIS and the Mouratoglou Academy Administrators will adhere to safe recruiting practices when hiring all faculty and staff, including:

- / Safeguarding and Child Protection Policy is available on the school website
- / Appropriate criminal background checks for employees
- / (May include) verbal reference checks

- / Declarations as part of the MIS application form located on the recruitment website
- / Child protection questions as part of interviews (documented)
- / A safeguarding induction will be provided for all new employees, including appropriate training and recorded understanding of safeguarding policies and procedures and MIS Code of conduct (and other relevant documents by department.

Third Party Providers

- / Third party providers must provide evidence of:
- / Criminal Background Checks for all adults working with children.
- / Child Protection Policies (as appropriate), if not this policy prevails.

Volunteers

For all volunteers who have regular access to small groups / individual children :

- / a criminal background check must be completed.
- / must be made aware of this Policy.

MONITORING OF PERSONNEL

To ensure compliance with child protection policies, the following guidelines outline the monitoring of personnel involved in child-related roles:

- / Annual Meetings with HR and Direct Supervisors
- / Annual Background Checks
- / Annual Review of usual staff Documentation (IDs or valid resident's permit, etc.)
- / Record Keeping in each employee's personal file
- / Confidentiality and Data Protection

TRAINING

OBJECTIVES OF STAFF TRAINING

- / Ensure all staff understand their roles and responsibilities in safeguarding and child protection.
- / Equip staff with the skills to identify and respond to risks, including abuse, neglect, and bullying.
- / Promote a culture of vigilance, accountability, and respect.

STUDENTS - AGE APPROPRIATE CURRICULUM

- / Themes raised in the child protection policy are integrated into the curriculum at all levels in ageappropriate ways. Administrators, support staff, and teachers will collaborate in coordinating themes across the school and also to work with individual classes and groups as needed.
- / Boarding house hosts regular meetings about specific topics (bullying, academy values, etc.)
- / Sensible age appropriate topics covered in subjects like Health and SVT classes.

WHOLE SCHOOL SAFEGUARDING TRAINING

STAFF TRAINING

Each staff member receives appropriate Child protection training related to their job description (valid 2 years) or re-training as needed, meeting international Safeguarding standards, from ChildSafeguarding.com.

- / Child Protection Training for Board Members, Owners, and Senior Leaders

Audience: Governance and Leadership

- / Level 1 - Fundamental Child Protection Training for Educators

Audience: Teachers, Coaches, Educators, Boarding house supervisors, medical staff and tennis and their managers.

- / Child Protection Awareness Training for Support Staff.

Audience: Support Staff and Volunteers.

ANNUAL POLICY REVIEW

- / The Safeguarding Committee reviews and updates the Safeguarding Policy each year.
- / Managers ensure their team understands and follows the policies.

OUR COMMITMENTS

- / **Staff Training:** Identify and respond to abuse. Understand reporting procedures. Maintain professional boundaries.
- / **Student Awareness:** Recognize unsafe situations. Know their rights. Understand topics like bullying, online safety, and respectful behavior
- / **Parent Involvement:** Access workshops, online resources, and tutorials.
- / **Regular Refreshers:** Annual updates keep everyone current.
- / **Specialized Roles :** Advanced training for handling complex cases and referrals.

SPECIFIC TRAINING

- / Managers and supervisors receive regular child protection training from local authorities (gendarmerie).
- / Gendarmerie-led sessions for students cover issues like bullying and cyberbullying.

PARENT RESOURCES

- / The school website provides the Safeguarding and Child Protection Policy.
- / Parents, guardians, and caregivers can access an online child protection training tutorial on ChildSafeguarding.com.

ENVIRONMENTAL SECURITY

CAMPUS MONITORING

The campus is equipped with high-definition surveillance cameras and a perimeter protection system designed to detect intrusions and unauthorized exits. These systems are managed through a video monitoring center and monitored by on-site agents. The Academy also implements round-the-clock security patrols across the premises, including the residence and training areas.

SECURITY SYSTEMS

The Academy's security systems include:

/ Access Control Systems: Gates and doors are secured with access badges. The security personnel ensures only authorized individuals are allowed entry.

/ ID badges: Each staff member is required to wear an ID badge provided by the Academy.

/ CCTV Surveillance: Cameras are placed throughout key areas, such as entrances, dormitories, tennis courts, and office areas. Footage is regularly monitored by security agents, and the system includes video verification for late-night hours. There are 45 cameras within the Campus and 211 on site overall.

/ Physical Barriers: The main gates are operated by security personnel, with access times strictly regulated. The gates are open from 6:00 AM to 7:30 PM, with additional patrols conducted after hours.

/ Emergency Protocols: In case of incidents like intrusions, predefined procedures are followed, including contacting the local police or emergency services if necessary.

REQUIREMENTS FOR VISITORS

Visitor Access: All visitors (including parents and contractors) must register at the reception. A visitor badge is issued upon arrival and must be worn throughout the visit. The visitor must be escorted by staff during their time on the Premises. Upon Departure, Visitors Are Required To Return The Badge And Sign Out.

Campus building access

Access to the campus building is prohibited to anyone outside the building, without authorization from the Management. All access doors and are secured with access badges. Furthermore, the enclosed school courtyard is separated from the rest of the sports facilities by fences and access is made through a gate, secured with access badges.

/ Day students do not have access to the campus building on weekends and Monday to Friday from 7:15 p.m. to 7:45 a.m., unless authorized by a member of staff.

/ Day students are not allowed on the upper floors of the school building 24/7.

/ Non boarding training center athletes who are not MIS students are not authorized within the campus building (unless exceptionally authorized by a member of staff).

/ Parents of boarders are authorized to access the floors with the authorization of a member of staff and by having asked an access badge to the reception of the boarding house.

/ Access to the hall of the campus building is authorized for the parents of boarders and day students (apart from health protocols).

/ Animals are not allowed within the campus building.

CAMPUS EVALUATION

The Academy is committed to regular evaluations of the campus environment to ensure that any risks to child protection are identified and mitigated. This includes:

/ Routine Risk Assessments: Security measures and overall safety protocols are regularly assessed to ensure they meet safeguarding standards.

/ Safety Drills: The Academy conducts regular emergency drills (e.g., intrusion, evacuation, natural disasters) in collaboration with local law enforcement and emergency services.

/ Incident Reporting: All safety incidents, including potential risks, are logged and reviewed. Specific procedures are in place for real-time reporting and follow-up actions.

These security measures, along with strict access control and regular safety audits, ensure a safe and secure environment for all students, staff, and visitors, in line with the Child Protection and Safeguarding Policy at Mouratoglou Academy.

MONITORING AND EVALUATION

MIS ensures its continuous attention on Child Protection through regular measures to keep policies, procedures, and up to date.

REGULAR REVIEWS & RISK ASSESSMENT

ANNUAL REVIEW AND DOCUMENTATION

This policy is :

/ reviewed annually by the Child Protection Committee

/ approved by the President of MIS Operational Board

/ updated based on a yearly risk assessment of child protection incidents to ensure improvements, accuracy, and effective record-keeping.

ANNUAL RISK ASSESSMENT

/ A comprehensive risk assessment is conducted each year, focusing on: Child protection incidents that occurred during the school year. Emerging risks, trends, or vulnerabilities identified through these incidents.

/ The purpose of this assessment is to: Identify gaps in current policies and practices. Ensure accuracy and consistency in record-keeping. Highlight areas for procedural or operational improvements.

POLICY MODIFICATIONS AND IMPROVEMENTS

/ Based on the risk assessment, the policy is modified to: Strengthen safeguarding measures. Address specific vulnerabilities revealed by past incidents. Ensure compliance with updated legal and regulatory requirements.

COMMUNICATION OF UPDATES

/ Approved changes are communicated through training sessions and/or written updates.

APPENDIX

This policy is part of a larger group of policies and resources within the school and local community. Within the appendix you will find links or references to key policies and/or resources that involve Child Protection at MIS.

Documents specific to MIS:

- / Child protection disclosure/concern report
- / Charter for the Use of IT Resources, Digital Tools, and Social Media
- / Medical and Sports Staff Charter

Documents issued by the French National Education System

- / Support and management of child protection cases within the National Education system.
- / Procedure for Reporting a Child or Young Person in Danger or at Risk

Documents issued by the child protection authorities:

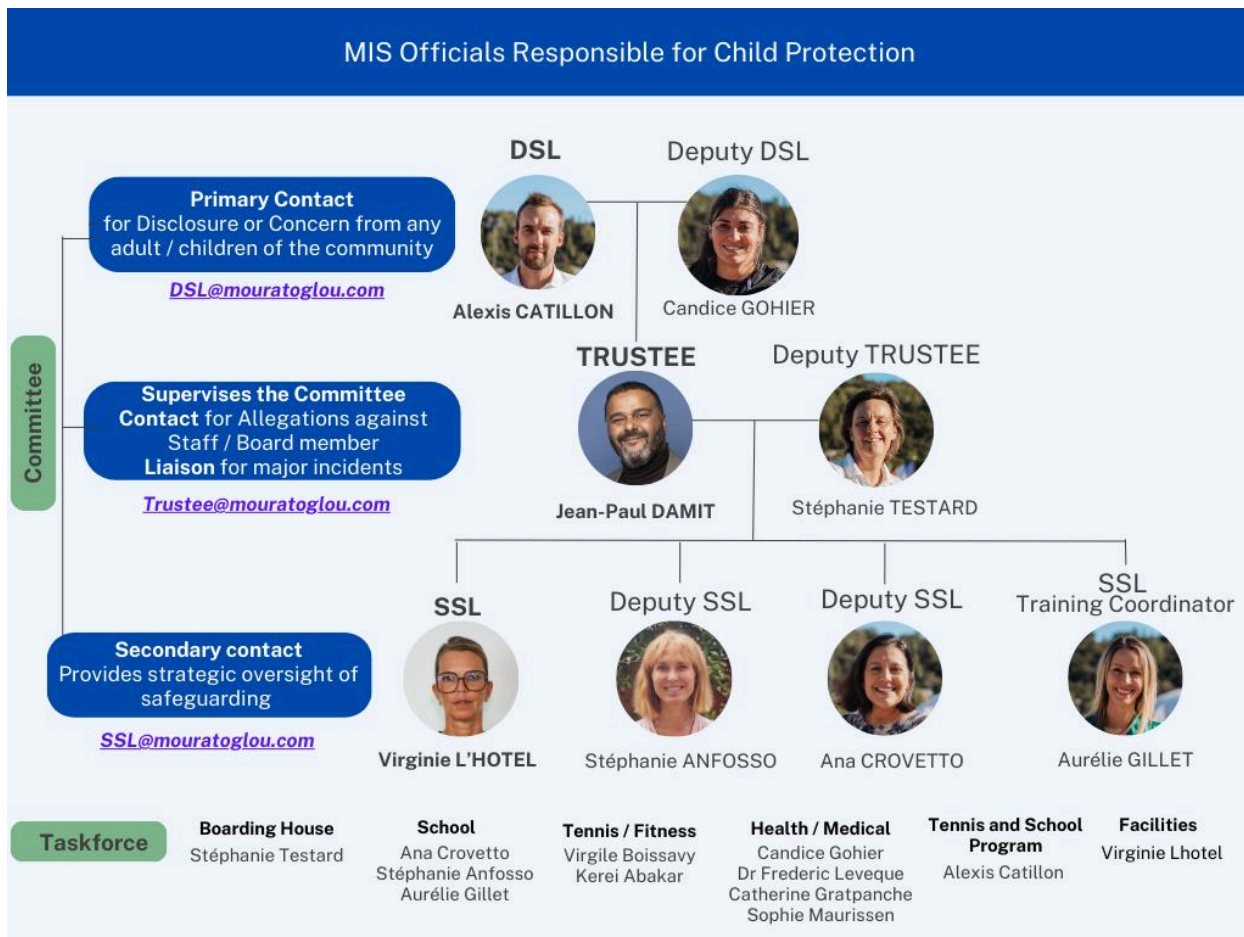
- / Reporting form for a concerning situation – ADRET 06
- / Brochure: 119 - The National Child Protection...

This Child Protection Policy was authored using the Child Protection Policy Template developed by ChildSafeguarding.com (<http://childsafeguarding.com>) and 112 Safeguarding (<http://112safeguarding.com>).

Supporting documents:

- / Human Resources policies or handbook, as related to Child Protection
- / Internal rules
- / Visitor sign in requirements
- / Codes of conduct for each department: teachers, boarding house, coaches.

INTERNAL CONTACTS



EXTERNAL CONTACTS

PURPOSE	ORGANISATION	CONTACT
Emergency	EUROPEAN EMERGENCY NUMBER	112 114 (par SMS)
French Emergency Medical Assistance Service	SAMU	15
Fire & accident	Sapeurs Pompiers	18
To report a crime/offense requiring an immediate police response	Police	17
To report a crime/offense	Gendarmerie nationale	Local gendarmerie -Valbonne 04 93 65 22 40
Reporting Child Abuse	SNATED (Service National d'Accueil Téléphonique de l'Enfance en Danger)	119 Or Chat on : www.allo119.gouv.fr
Child Protection Authorities for the Alpes Maritimes department	ADRET 06 (Antenne Départementale de Recueil, d'Evaluation et de Traitement des informations préoccupantes)	0.805.40.06.06 protectiondelenfance@departement06.fr Monday to Friday: 8.30am til 7.30pm. At night and during the weekend : 119 Ou 04 92 60 72 00
Child Protection Group	PMI ou Protection Maternelle et Infantile - Conseil Départemental des Alpes maritimes	04 97 18 66 36
Public Prosecutor	TGI de Grasse	04 92 60 72 00
Emergency service Children hospital	Service des Urgences de l'hôpital CHU- LENVAL	04 92 03 03 03 Service des Urgences 57 avenue de la Californie 06000 NICE
Psychiatric Service Maltraitance unit	Cellule de Maltraitance à l'hôpital pédiatrique CHU- LENVAL (Unité médico-judiciaire)	04 92 03 04 42 Service des Urgences 57 avenue de la Californie 06000 NICE
Child protection hotline	Allo Enfance en Danger	119
Helpline dedicated to bullying and cyber-bullying	E-enfance	3018
Suicide protection Helpline	Suicide Ecoute	3114
Psychological support for children / youth (12 to 20 yo)	Maison des Adolescents - Centre Marina Picasso	04.93.26.10.92 0785.2735.31 (par SMS) E-psychologist available Monday to Friday, from 9am to 5pm



CONCERN REPORT

CHILD PROTECTION DISCLOSURE

1. Date & Time of Report :

2. Reporter's Information

/ Name of Person Completing the Report:

/ Role/Position:

/ Department:

/ Contact Number/Email:

3. Child's Information

/ Name of Child:

/ Date of Birth (DD/MM/YYYY):

/ Grade/Class:

/ Nationality (if relevant):

/ Address (if relevant):

4. Nature of Disclosure/Concern

/ Date & Time of Alleged Incident/Disclosure:

/ Location (if applicable):

/ Type of Concern (check all that apply):

Physical abuse

Emotional abuse

Neglect

Bullying (including cyberbullying)

Sexual abuse or exploitation

Other (please specify):

/ Brief Description of the Disclosure/Concern: :

Provide a clear and concise account of what was disclosed or observed.

5. Details of Disclosure

/ Exact Words Used by the Child (if applicable):

Include as many direct quotes as possible. Use the child's own words, without paraphrasing or interpreting.

/ Behavioral Observations:

Note any changes in the child's demeanor, appearance, or behavior that prompted concern.

6. Actions Taken by the Reporter

/ Immediate Response:

/ Was the concern disclosed directly to you by the child? [Yes/No]

/ Did you offer reassurance? [Yes/No]

/ Did you discuss next steps with the child (if appropriate)? [Yes/No]

/ Other Actions Taken:

- Informed Department Manager/Designated Safeguarding Lead (DSL)? [Yes/No]
 - Name of Manager/DSL Informed:
 - Date & Time Informed:
- Contacted any external agencies (e.g., Child Protective Services, Police)[Yes/No]
 - Name of Agency:
 - Date & Time Contacted:
- Other Action(s) Taken:

7. Reporter's Observations & Notes

Include any additional information that could be helpful:

- Context around the child's situation
- Previous concerns or relevant background details
- Any immediate safeguarding measures put in place

8. Signature & Date

/ Signature of Person Reporting:

/ Date Signed:

9. Designated Safeguarding Lead (DSL) / Management Review

/ Name of DSL/Management Reviewer:

/ Role/Position:

/ Date & Time of Review:

/ Action(s) / Decision(s) Taken:

/ Signature of DSL/Management Reviewer:

IMPORTANT REMINDERS

/ Confidentiality: All information in this report must be kept strictly confidential and shared only with relevant safeguarding personnel or external authorities as required by law.

/ Accuracy: Record details objectively, using the child's exact words wherever possible. Avoid interpreting or making assumptions about what was said or observed.

/ Timeliness: Complete and submit this form to the Designated Safeguarding Lead (DSL) or appropriate authority as soon as possible following disclosure or identification of the concern.

/ Follow-Up: Continue to monitor the situation and remain available for any further questions or actions required by the school's safeguarding team or relevant authorities.