

---

## Child Protection Policy

Policy # 4.1

Approved: October 2015

Circulation: BMTSP

Reviewed: August 2019

Date to Review: August 2020

---

### 1. Rationale

1.1 Child abuse and neglect are concerns throughout the world. Child abuse and neglect are violations of a child's human rights and are obstacles to the child's education as well as to their physical, emotional, and spiritual development.

1.2 Schools fill a special institutional role in society as protectors of children. Schools need to ensure that all children in their care are afforded a safe and secure environment in which to grow and develop, both at school and away. Educators and other adults working in schools, having the opportunity to observe and interact with children over time, are in a unique position to identify children who are in need of help and protection. As such, they have a professional and ethical obligation to identify children who are in need of help and protection and to take steps to ensure that the child and family avail themselves of the services needed to remedy any situation that constitutes child abuse or neglect.

1.3 United World College Thailand (UWCT) has as its mission the cultivation of a good heart, a balanced mind, and a healthy body for every student. In order to help fulfill this mission, UWCT works assiduously to create a safe and protected environment in which children can grow and learn. Part of our work to create and ensure this safe environment is the implementation of a Child Protection Policy. While we recognize that prevention is always preferable, we understand that we cannot control what may have occurred or what may occur in a child's life outside the school community. As such, we need to be adroitly aware of any signs of abuse or neglect, and act ethically and compassionately to protect the children in our care.

1.4 All staff employed at UWCT are mandated reporters<sup>1</sup>, and must report suspected incidents of child abuse or neglect whenever the staff member has reasonable cause to believe that a child has suffered, or is at significant risk of suffering abuse or neglect. Reporting and follow up of all suspected incidents of child abuse or neglect will proceed in accordance with administrative regulations respective to this policy. Furthermore, cases of suspected child abuse or neglect may be reported to the appropriate employer, to the respective consulate in Phuket or Bangkok, Thailand, to the appropriate child protection agency in the home country, and/or to local authorities.

1.5 UWCT seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of their lives. As such, UWCT will distribute this policy annually to all parents and applicants, will communicate this policy annually to students, will provide training for all staff, will make every effort to implement hiring practices to ensure the safety of children, and will review the policy annually for compliance and effectiveness.<sup>1</sup>

1.6 In the case of a staff member reported as an alleged offender, UWCT will conduct a full investigation following a carefully designed course of due process ([Appendix 7](#) - to be developed), keeping the safety of the child as the highest priority.

1.7 UWCT endorses the United Nations Convention on the Rights of the Child, which has informed this document. We have also taken guidance from the Thailand Child Protection Act, 2003, Association of International Schools in Africa Child Protection Handbook, 3<sup>rd</sup> Edition, from UNICEF document Child Protection in Educational Settings – Findings from Six Countries in East Asia and the Pacific, 2012, from Working Together to Safeguard Children, 2013, HM Government, UK, from the SAFE Network, 2012, UK, from the Cambridge International School, UK and from the National Child Traumatic Stress Network, USA.

## 2. Definitions

2.1 **Child Abuse** – Child abuse is a serious and complex problem that may occur in the lives of children and young people. It often occurs in environments that are isolated and stressful and affects those who are most vulnerable.

Child abuse is the term used to describe different types of maltreatment suffered by a child or young person. It can be non-accidental physical injury, neglect, trauma, sexual abuse and emotional abuse, including psychological harm of children and young people, and requires different and specialised responses.

In its most serious forms, abuse can lead to death or long-term harm to the physical or emotional well being of a child or young person.

There are five main areas of Child Abuse. It should be recognised that any signs of abuse may also be symptomatic of other problems.

2.2 **Physical abuse** may involve hitting, punching, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing intentional physical harm to a child. (These symptoms could also indicate harm to self, such as cutting and suicide ideation).

---

<sup>1</sup> Thai Child Protection Act, B.E. 2546, Section 29

Some signs or symptoms that may indicate physical abuse -

- a. Bruises, burns, sprains, dislocations, bites, cuts
- b. Improbable excuses given to explain injuries
- c. Injuries which have not received medical attention
- d. Injuries that occur to the body in places not normally exposed to falls, rough games, etc.
- e. Repeated urinary infections or unexplained stomach pains
- f. Refusal to discuss injuries
- g. Withdrawal from physical contact
- h. Arms and legs kept covered in hot weather
- i. Fear of returning home or of parents being contacted
- j. Showing wariness or distrust of adults
- k. Self-destructive tendencies
- l. Being aggressive towards others
- m. Being very passive and compliant
- n. Chronic running away

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

Some signs or symptoms that may indicate emotional abuse -

- a. Physical, mental and emotional development is delayed
- b. Highly anxious
- c. Showing delayed speech or sudden speech disorder
- d. Fear of new situations
- e. Low self-esteem
- f. Inappropriate emotional responses to painful situations
- g. Extremes of passivity or aggression
- h. Drug or alcohol abuse
- i. Chronic running away
- j. Compulsive stealing
- k. Obsessions or phobias
- l. Sudden under-achievement or lack of concentration
- m. Attention-seeking behavior
- n. Persistent tiredness
- o. Lying

**2.4 Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (i.e. rape) or non-penetrative acts. They may include non-contact activities, such as

involving children in the production or viewing of pornographic material or encouraging children to behave in sexually inappropriate ways. Children involved in commercial sex work are victims of sexual abuse, whether they perceive themselves as victims or not.

- a. Some signs or symptoms that may indicate sexual abuse – (Please note that frequently there are no signs of this type of abuse)
- b. Pain or irritation to the genital area
- c. Vaginal or penile discharge
- d. Difficulty with urination
- e. Infection, bleeding
- f. STDs
- g. Fear of people or places
- h. Aggression
- i. Regressive behaviours, bed wetting or stranger anxiety
- j. Excessive masturbation
- k. Sexually provocative
- l. Stomach pains or discomfort walking or sitting
- m. Being unusually quiet and withdrawn or unusually aggressive
- n. Suffering from what seem physical ailments that can't be explained medically
- o. Showing fear or distrust of a particular adult
- p. Mentioning receiving special attention from an adult or a new “secret” friendship with an adult or young person
- q. Refusal to continue with school or usual social activities
- r. Age inappropriate sexualized behavior or language

2.5 Neglect is the persistent failure to meet a child's basic physical or physiological needs, likely to result in serious impairment of the child's health or development.

Some signs or symptoms that may indicate neglect -

- a. Medical needs unattended
- b. Lack of supervision
- c. Consistent hunger
- d. Inappropriate dress
- e. Poor hygiene
- f. Inadequate nutrition
- g. Fatigue or listlessness
- h. Self-destructive
- i. Extreme loneliness
- j. Extreme need for affection
- k. Failure to grow
- l. Poor personal hygiene
- m. Frequent lateness or non-attendance at school
- n. Low self-esteem

- o. Poor social relationships
- p. Compulsive stealing
- q. Drug or alcohol abuse

2.6 Trauma Childhood traumatic stress is the psychological and biological responses resulting from a child's inability to cope with an overwhelming situation. These overwhelming experiences are referred to as traumatic events or trauma. Children can be exposed to trauma in a number of ways. Acute trauma is a short-lived experience tied to a particular place or time. Children also may experience chronic trauma, or prolonged exposure over a long period or time to traumatic situations.

Children lacking the ability to adapt and handle traumatic events may display the following symptoms:

### **Preschool Children**

- a. Feel helpless and uncertain
- b. Fear of being separated from their parent/caregiver
- c. Cry and/or scream a lot
- d. Eat poorly and lose weight
- e. Return to bedwetting
- f. Return to using baby milk
- g. Develop new fears
- h. Have nightmares
- i. Recreate the trauma through play
- j. Are not developing to the next growth stage
- k. Have changes in behavior
- l. Ask questions about death

### **Elementary School Children**

- a. Become anxious and fearful
- b. Worry about their own or others' safety
- c. Become clingy with a teacher or parent
- d. Feel guilt or shame
- e. Tell others about the traumatic event again and again
- f. Become upset if they get a small bump or bruise
- g. Have a hard time concentrating
- h. Have fears that the event will happen again
- i. Have difficulty sleeping
- j. Show changes in school performance
- k. Become easily startled

### **Middle and High School Children**

- a. Feel depressed and alone
- b. Discuss the traumatic events in detail
- c. Develop eating disorders and self-harming behaviours such as cutting

- d. Start using or abusing alcohol or drugs
- e. Become sexually active
- f. Feel like they are going crazy
- g. Feel different from everyone else
- h. Take too many risks
- i. Have sleep disturbances
- j. Don't want to go to places that remind them of the event
- k. Say they have no feeling about the event
- l. Show changes in behaviour

### 3. Responsibilities

3.1 "School personnel are particularly well-placed to observe the outward signs of abuse and the unexplained changes in behaviour or performance which may indicate abuse." (UK DES Circular 4/88)

3.2 Protecting the welfare of children is the role of every adult who interacts with children at UWCT. This includes all adults knowing how to respond to suspected cases of child abuse and neglect and the process for reporting suspected cases to the relevant persons.

### 4. Procedures

4.1 **Safe Recruitment** – UWCT is committed to safe recruitment. The Human Resources Department follows rigorous procedures for the appointment of all members of staff. (Please see [Appendix 3](#))

4.2 **Staff Training** – UWCT is committed to maintaining and increasing staff awareness of how to prevent, recognise and respond to child abuse and neglect. The school ensures that all staff are updated annually on procedures relating to child abuse and neglect. As part of their induction, all adults will familiarise themselves with the UWCT Child protection policy and will be encouraged to read additional resource material. (Please see [Appendix 4](#))

4.3 A further commitment is training senior leaders on a regular basis to ensure that they are up to date with the details of this policy and the related procedures. It is their responsibility to continue to review the details of this policy to ensure it meets the needs of the students under their care.

### 5. PROCEDURE IN CASE OF DISCLOSURE OF ABUSE, OR SUSPECTED ABUSE

5.1 If staff suspect a child has been abused or neglected, the following procedures should be implemented (please see FLOW CHART OF ACTION below):

- a. Immediately and no less than 24 hours after a disclosure, inform the School Counselor and the Head of School. If the School Counselor is available and has been informed, make the report to the Head of School together with the Counselor. It is however not sufficient to inform only the School Counselor.

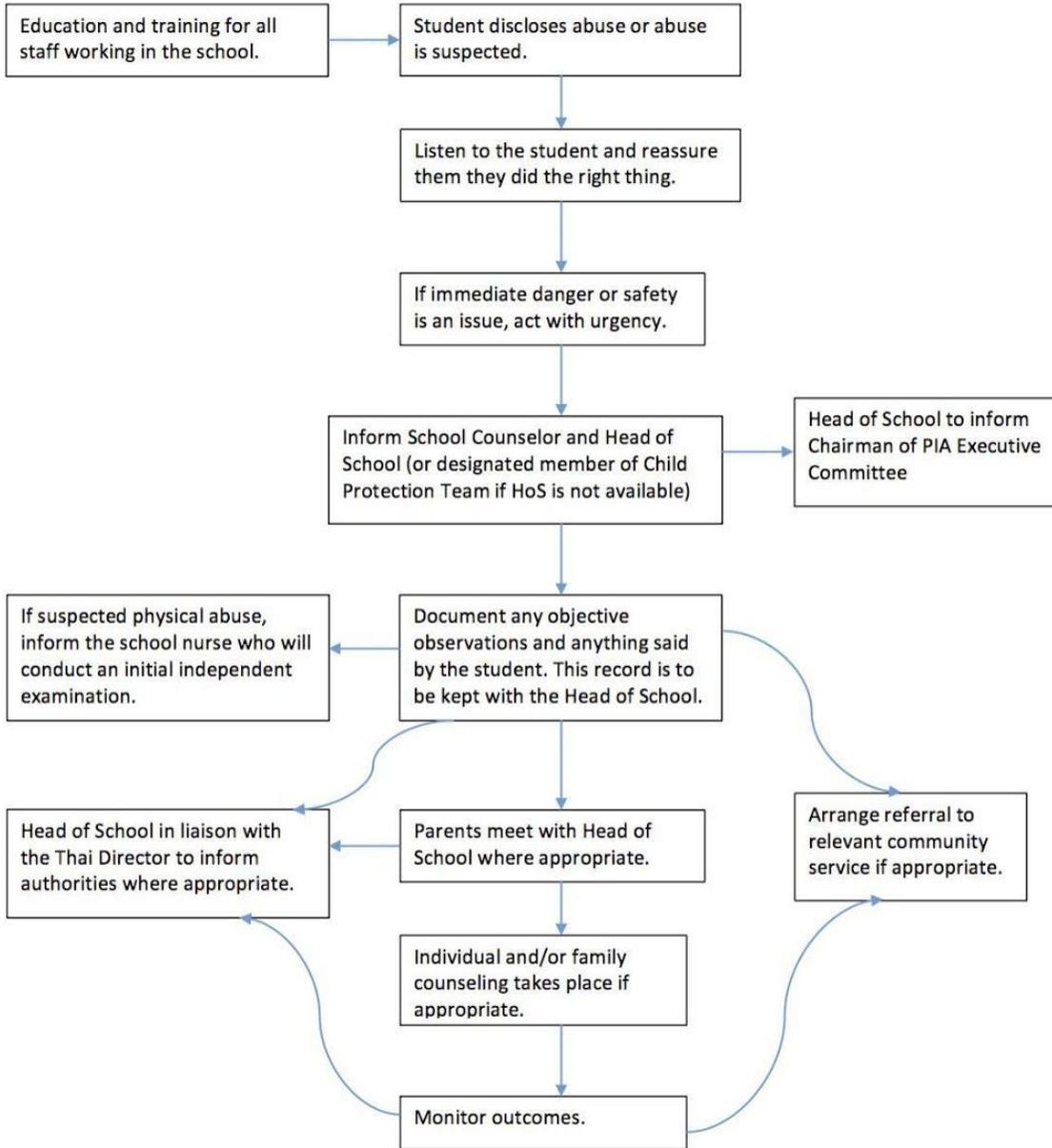
- b. A written record of the disclosure must be prepared including date and time and what the child said. This must be passed on to the School Counselor, or the Head of School if the School Counselor is unavailable. All staff involved in a disclosure or concern must keep written notes with time and date.
- c. If a child has made an allegation involving a member of staff, the Head of School must be informed immediately.
- d. If the child is considered to be in immediate danger, or there is concern further harm may occur, the Head of School must be informed immediately. The Head of School shall inform the Chair of the School Board.

5.2 UWCT staff will be required to record observations using the school's Child Protection Concern Form 1 (see [Appendix 2](#)). (Please see General Guidelines on handling a disclosure in [Appendix 1](#))

5.3 If there are obvious signs of harm the student will be taken to the School Clinic immediately. If we suspect that an employed or voluntary worker in the school has abused a child we will report the matter promptly to the Head of School.

5.4 **Emergency** - First aid is to be given as in any emergency. Follow-up care and counselling will commence as soon as practical.

FLOW CHART OF ACTION



- Points to note:
1. Documentation may subsequently be used in court as evidence for either side.
  2. Avoid making judgment – simply record the facts.
  3. Interviewing of suspected abuse victims is a specialized procedure best left to those who are trained in such techniques.
  4. The School Counselor should be responsible for ensuring that the child’s welfare remains paramount.

## APPENDIX 1 - Child Protection Procedures - Your Responsibilities

What should you do if you are worried about a child's welfare?

What should you do if a child tells you something that concerns you? (Makes a disclosure of abuse)

DO NOT KEEP YOUR CONCERNS TO YOURSELF.

### 1. General guidelines

Reassure the person that they were right to raise the concern.

- a. Create trust with the complainant but do NOT promise to keep secrets.
- b. Take what they say seriously, even if it appears hard to believe.
- c. Address health and protection needs or contact authorities if this is urgently required. Contact the School Counselor and Head of School as soon as the situation allows this, and within 24 hours. Gather information on the case.
- d. You are not expected to investigate the case but gather basic information about what may have taken place.
- e. Record the actual words used as soon as possible, if not immediately.
- f. Avoid asking too many questions: ask only the number of questions required to gain a clear understanding of the complaint.
- g. Avoid asking "why" and "how" something took place.
- h. Establish and record details of all those who may be at risk. Address issues of confidentiality.
- i. Explain that information will only be shared with people who need to know.
- j. Explain that it is in the best interest of the individual disclosing that the concern is reported. Explain to the complainant what will happen next. Explain that the concern will be reported. Inform him/her/them that you will provide feedback on what happens. Report as per the reporting procedure.

### 2. Guidelines for Responding to a Child's Disclosure

- a. Do not let a child swear you to secrecy before telling you something. You may need to report, which the child will view as breaking your trust with them.
- b. If a child asks to speak with you, try to find a neutral setting where you can have quiet and few interruptions.
- c. Do not lead the child in telling. Just listen, letting him/her explain in his/her own words. Do not pressure for a great amount of detail.
- d. Respond calmly and matter-of-factly. Even if the story that the child tells you is difficult to hear, it is important not to register disgust or alarm.
- e. Do not make judgmental or disparaging comments about the abuser - it is often someone the child loves or with whom he/she is close.
- f. Do not make promises to the child that things will get better.
- g. Do not confront the abuser.
- h. If the child does not want to go home, this should be considered an emergency. Report and handle immediately by contacting the Head of School. Do not take the child home with you!

- i. Respect the child's confidence. Share with the Child Protection Team, but limit information from and with other staff.
- j. Explain to the child that you must tell someone else to get help.
- k. Try to let the child know that someone else also will need to talk with him/her and explain why.
- l. Empower the student by as much as possible allowing the child a part in the process.

**APPENDIX 2****INITIAL RECORD OF CONCERN – FORM 1**

(to be completed by adult who has first point of contact with child)

**Child's Name and Class:**

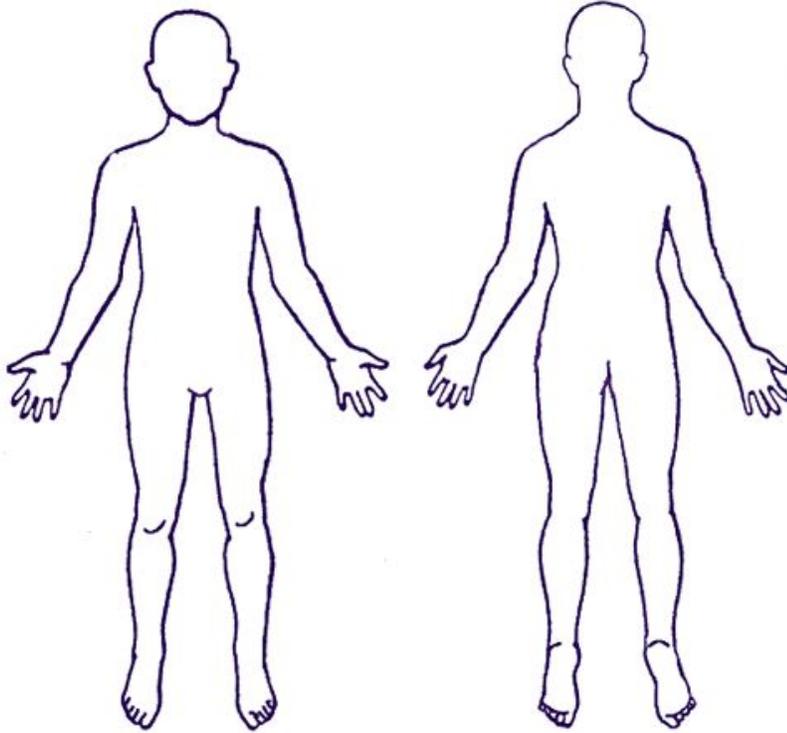
**Date and Time of Concern:**

**Your Account of the Concern:**

(what was said, observed, reported and by whom)

**Additional Information:**

(context of concern/disclosure/details of any physical signs)



Please indicate any markings on body outline:

**Your Response:**

(what did you do/say following the concern)

**Your Name:**

**Your Signature:**

**Date:**

**Your Position in School:**

**Date and Time of this Recording:**

**FORM 1 passed to Head of School: Yes / No**

**Date and time of meeting arranged to discuss FORM 1 with Head of School:**

**Child Protection Record – FORM 2**

(completed by Vice Principal) Date **FORM 1** was received and discussed:

<b>Child's Name:</b> <b>Date of birth:</b> <span style="margin-left: 200px;"><b>Grade:</b></span> <b>Class teacher:</b>			
Male/Female/Third	<b>Ethnic Origin</b>	<b>Disability</b>	

<b>Record of initial discussion:</b>	<b>Date of referral</b>	<b>Reported by</b>
<b>Who has the information been shared with?</b>		
<b>Initial action points</b>	<b>Agreed timeline</b>	<b>Action by?</b>

<b>Report on action taken:</b> including professional agencies known to be involved with the family, the extent to which both the child and the family are aware of the steps already taken. If parents have been informed, then time and dates and a record of the meeting.	<b>Date</b>	<b>Action by?</b>
<b>Further action points</b>	<b>Date</b>	<b>Action by?</b>

--	--	--

This confidential document needs to be kept with the Initial Record of Concern – **FORM 1**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## APPENDIX 3

## Background checks

1. Non-Thai teachers
  - a. Working outside their home country for (1) year or more
    - 1.1.1. Obtain police background check from country of current residence
    - 1.1.2. Obtain police background check from home country
    - 1.1.3. [Obtain self declaration that the employee is fit to work with children](#)
    - 1.1.4. [Obtain declaration from immediate previous employer](#)
    - 1.1.5. [Signed code of conduct](#)
    - 1.1.6. Google Search
    - 1.1.7. Character References
  - b. Working in home country
    - i. Obtain police background check from home country
    - ii. [Obtain self declaration that the employee is fit to work with children](#)
    - iii. [Obtain declaration from immediate previous employer](#)
    - iv. [Signed code of conduct](#)
    - v. Google Search
    - vi. Character References
2. Thai teachers and support staff
  - i. Obtain police background check from Thalang police department
  - ii. [Obtain self declaration that the employee is fit to work with children](#)
  - iii. [Obtain declaration from immediate previous employer](#)
  - iv. [Signed code of conduct](#)
  - v. Google Search
  - vi. Character References
3. Contracted service providers (including transport, Thanyapura, Outdoor Education, PAPA)
  - i. Obtain police background check from home country/Thalang Police
  - ii. [Obtain self declaration that the employee is fit to work with children](#)
  - iii. [Obtain declaration from immediate previous employer](#)
  - iv. [Signed code of conduct](#)
  - v. Google Search
  - vi. Character References
4. Parents and other volunteers

If a parent or volunteer will be supervising students independently, **without a UWCT staff member taking responsibility**, the following will need to be completed:

  - i. Obtain police background check from home country/Thalang Police
  - ii. [Obtain self declaration that the volunteer is fit to work with children](#)
  - iii. [Signed code of conduct](#)

iv. Google Search

5. An overview of current procedures and areas for development can be found [here](#).

## APPENDIX 4

### Education and training of staff, parents and students

1. In order to help protect children, education and training will focus on the information and skill deficits found in many children and their families that make them most vulnerable to be exploited.
  - a. Adults are afraid to talk about sex with their children and thus children are left without even a vocabulary to talk about what may have happened
  - b. Children are told to obey parents and respect all adults unconditionally, thus not building any skills in assertiveness or decision making;
  - c. Children are not allowed their own feelings, instead adults tell children, “Don’t cry,” “Don’t be afraid,” “It’s bad to be angry,” “Don’t laugh at that,” thus often removing the inner signals children need to protect themselves and understand what is happening;
  - d. Forgiveness is forced upon victims of abuse, adding further responsibility for an assault they are not to blame for in any way;
  - e. Family sanctity, respect and shame are all used incorrectly to keep silent about the sexual abuse of our children.
  
2. The nine major concepts to teach through these lessons are:
  - a. Body Access and the right to be safe
  - b. A continuum of touch from safe to unsafe
  - c. Intuition and using feelings for safety
  - d. The right to say “NO”
  - e. Safety rules
  - f. Support systems
  - g. Private body parts
  - h. Sexual contact with an adult is never the child’s fault
  - i. Secrets about touching are not okay.
  
3. The nine major concepts would be taught within three major components of Personal Safety lessons for students:
  - 3.1 Information
    - a. Touching rules (boundaries)
    - b. Body parts vocabulary
    - c. Sexuality / Gender differences and issues  
Support systems
    - d. Laws
    - e. Telling / Reporting for early intervention

### 3.2 Skills

- a. Assertiveness
- b. How to tell (using support systems)
- c. Decision making

### 3.3 Building self-esteem

- a. Understanding feelings/emotions
- b. Affirmation of worth and rights
- c. Building/teaching empathy

## APPENDIX 5

### Physical environment security

- 1. Entry to school premises

- a. All UWCT employees will be issued a photo ID card that must be displayed at all times during school hours.
  - b. All parents/guardians and/or designated drivers/nannies will be issued a photo ID card that must be displayed at all times while on school grounds.
  - c. All students will be issued key fobs used to gain entry through the electronic gates
  - d. All visitors must sign in at the security station, and will be provided with a visitor ID card that must be displayed at all times while on school grounds.
  - e. No visitors are allowed on campus without a completed Visitor Request Form.
  - f. Entry from Thanyapura is controlled by electronic access gates.
2. Tracking students and security during school hours
- a. Student attendance is taken by 0810 and sent to the database manager by email or through ManageBac.
  - b. The database manager is responsible for keeping student attendance up to date, and for informing the homeroom and other appropriate teachers of any changes throughout the day.
  - c. All classrooms are to have glass in doors. Teachers/support staff and students are not to be alone together in areas where others cannot see them.

## APPENDIX 6

### Boarding House

1. The Boarding House is safeguarded under this Child Protection Policy and Procedures.
2. All adults operating in an unsupervised manner with boarders have been given the legal clearance to do so.
3. Staff know their obligations in relation to child protection as well as their duty to disclose.

Staff abide by legal boundaries in their relationship with boarders.

4.

## APPENDIX 7

### 1. Procedure when a member of the UWCT staff is named as an alleged offender

#### 1.1

The School's procedures for dealing with allegations made against staff will be used where any member of staff or volunteer is alleged to have behaved in a way that has harmed a child, or may have harmed a child; has possibly committed a criminal offence against or related to a child; or may have behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she worked regularly or closely with children.

#### 1.2

Any allegations not meeting these criteria will be dealt with according to the employment contract.

#### 1.3

All such allegations must be dealt with as a priority, without delay.

### 2. Reporting an allegation is against a member of staff or volunteer

#### 2.1

Where an allegation or complaint is made against any member of staff, or volunteer, the matter should be reported immediately to the Head of School, or in their absence to one of the designated members of the Child Protection Team, who will inform the Chair of the School Board. Where the Head of School or the designated member receives an allegation, they will consult with the Child Protection Team immediately. The Child Protection Team will decide if the allegation warrants the services of a mental health professional to advise and inform the Child Protection Team, and to lead the investigation. Under no circumstances is the Child Protection Team to conduct its own investigation.

#### 2.2

Where an allegation or complaint is made against the Head of School, the matter should be reported immediately to one of the other designated members of the Child Protection Team and the Chair of the School Board. The Child Protection Team will decide if the allegation warrants the services of the designated community mental health professional to advise and inform the Child Protection Team, and to lead the investigation. Under no circumstances is the Child Protection Team to conduct its own investigation.

#### 2.3

The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

### 3. Disclosure of information

#### 3.1

The case manager will inform the accused person of the allegation as soon as possible after the Child Protection Team and community health professional have been consulted

#### 3.2

The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.

#### 3.3

Where the community mental health professional advises that a strategy discussion is needed, or the police need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

#### 3.4

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

### 4. Further action to be taken by the School

#### 4.1

A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance the School's employment procedures.

### 5. Ceasing to use staff

#### 5.1

If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the appropriate international/national education organisations will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the School Board without delay.

#### 5.2

If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy.

#### 5.3

Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the appropriate international/national education organisations.

## 6. Unsubstantiated, false or malicious allegations

### 6.1

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head of School will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.

### 6.2

Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

### 6.3

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

## 7. Record keeping

### 7.1

Details of allegations found to be malicious will be removed from personnel records.

### 7.2

For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

### 7.3

An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references.