



GRANGE SCHOOL

*A Culture of Continuous
Improvement*

Confidence | Respect | Integrity | Creativity | Service

CHILD PROTECTION POLICY

<p>Complied by: Head of School</p> <p>Print Name: Ms Abra Stoakley</p> <p>Signature:</p> <p>Date: 20 May 2020</p>	<p>Approved by the Head of School</p> <p>Print Name: Abra Stoakley</p> <p>Signature:</p> <p>Date:</p>
<p>Review Date: May 2020</p>	<p>Next Review Date: May 2021</p>
<p>Related Policies, Procedures and Guidelines:</p> <ul style="list-style-type: none"> • Staff Handbook • School Discipline Policy • Anti-Bullying • Student Handbook • Parents Handbook • Pastoral Care Policy • Privacy Policy • ICT Policy • Social Media Policy • Parent Contract • Recruitment Policy 	<p>Policy Superseded by this Policy:</p> <ul style="list-style-type: none"> • Child Protection Policy written 8 September, 2018.

Introduction

Children have the right to develop to their full potential in a safe and conducive environment. Therefore, the protection of children from neglect, abuse, violence and exploitation is an important aspect and should be given priority.

This policy is consistent with the philosophy of the Convention on the Rights of the Child (CRC), the International Legal Instruments including the UN Rights of the Child (ICMEC), The Child's Right Act 2003, The Child's Right Law 2007, – The Constitution of the Federal Republic Nigeria 1999 (as amended) and the The Child's Right Act (Enforcement Procedure Rules 2015), and the Department for Education's Keeping Children Safe in Education: Statutory Guidance for UK Schools (2020) which also emphasise the principle of the protection of children in their best interests.

In addition, The International Task Force on Child Protection (ITFCP) was formed in April 2014 to help international school communities address child protection challenges. Now a coalition of 90+ volunteers, the task force includes leaders of international education organisations, school leaders, counsellors and teachers, working collaboratively across professions with law enforcement officials and the medical community.

Two other international instruments make specific special provisions on the rights of the Child. These are the United Nations Convention on the Rights of the Child (1989) and the African Charter on the Rights and Welfare of the Child (1991). The two instruments contain substantially the same provisions. The provisions include right to life, health, education, special treatment in the administration of justice, protection against child abuse and torture, child labour, harmful social and cultural practices, sexual exploitation, drug abuse, sale, traffic and abduction, apartheid and discrimination, special provision for handicapped children, refugee children those separated from their parents and adopted children.

As a COBIS school, we are extremely committed to safeguarding and promoting the welfare of children, young people and adults. All applicants to Grange School must be willing to undergo child protection screening, including checks with past employers. We believe this policy should be a working document that is fit for purpose, represents the Grange School ethos, enables consistency and quality across the school and ensures consistency in practice.

The following documentation is also related to this policy:

- Dealing with Allegations of Abuse against Teachers and other Staff: Guidance for Local Authorities, Principals, School Staff, Governing Bodies and Proprietors of Independent Schools (DfE);
- Equality Act 2010-: Advice for Schools (DfE);
- Education (Independent School Standards) Regulations 2014
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE 2020);
- Mental Health and Behaviour in Schools: Department Advice (DfE 2016);
- Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children;

- The Children Act 1989 (and 2004 amendments)
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- Statutory Guidance on FGM
- Inspecting Safeguarding in Early Years, Education and Skills Setting (Ofsted);
- School Inspection Handbook (Ofsted);
- The Prevent Duty: Department advice for Schools and Childcare providers (DfE).

Grange School is committed to safeguarding and promoting the welfare of all children and take account of the information contained in the UK DfE documents 'Working Together to Safeguard Children' and 'Keep Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE 2018)' as the safety and protection of children is of paramount importance to everyone at Grange School. At all times we will ensure what is best in the interests of all students.

Grange School fully recognises its responsibilities for child protection. Our policy applies to all staff, directors, governors, volunteers and contractors working in the school. There are five main elements to our policy:

- Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children;
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been abused in accordance with his/her agreed child protection plan; and
- Establishing a safe environment in which children can learn and develop.

We recognise that because of the day to day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to;
- Ensure children know that there are adults in the school whom they can approach if they are worried;
- Include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse;
- Ensure we have a designated senior person for child protection who has received appropriate training and support for this role;
- Ensure we have nominated director/personnel responsible for child protection;
- Ensure every member of staff (including temporary and supply staff and volunteers) and governing body knows the name of the designated senior person responsible for child protection and their role;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible for child protection;
- Ensure that parents are aware of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus;

- Contact parents if there is an unexplained absence of more than two days of a pupil who is on the child protection register;
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences;
- Keep written records of concerns about children, even where there is no need to refer the matter immediately;
- Ensure all records are kept securely; separate from the main pupil file, and in locked locations;
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer;
- Ensure safe recruitment practices are always followed.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The content of the curriculum;
- The school's ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued;
- The school's behaviour policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviours are unacceptable, but they are valued and not to be blamed for any abuse which has occurred.

Purpose of the Policy

This Policy articulates the School's approach to the important issue of child protection. The focus of this School's duty of care is the protection of children from harm. This School cares for children, it must act in the best interests of the children in its control at all times and take all reasonable steps to ensure the safety of those children in the context of the School's educational activities.

The damaging consequences for a child, their future life and the impact upon their family as a result of harm they suffer at the hands of others and particularly by those in positions of trust are immeasurable. This School will seek to prevent any form of child abuse being experienced by a child in its care.

A failure by the School or members of its Community in addressing such child protection matters will mean a child has suffered and the School's standing in the community generally will have diminished. Every reasonable measure will be taken by the School to prevent this happening. The School will continue in its efforts to promote strategies for prevention among its students, staff and Community generally.

The School requires the support of all members of its Community to assist it in achieving these aims. This Policy is provided to all staff members upon their appointment.

2. Roles and Responsibilities

School

Should the School need to respond to allegations of this nature then the procedures followed by the School will be in accordance with all relevant legislation and will take into account other appropriate practices and guidelines aimed at the protection of children. This Policy and associated detailed procedures will be amended from time to time to take into account amendments to legislation and regulations.

The School has responsibilities towards the Nigerian Government agencies which include the Child Development Departments in the Federal and Lagos State Ministries of Women Affairs; National Council of Child Rights Advocates of Nigeria (NACCRRAN) as the umbrella NGO involved in Child Rights Advocacy, in meeting its legal obligations. In dealing with child protection matters the School's management will liaise with each of these authorities as well as seeking advice from the police and the School's Legal Advisers, as necessary.

The Head of School and Heads of Primary and Secondary

The Head of School and the Head of Primary and/or Secondary School as Head of a designated non-government (Private School) agency is required to respond to all allegations against employees. Reportable allegations and convictions are to be notified to the relevant authorities within 30 days of the Head of School becoming aware of such allegations or convictions.

The Head of School and/or the Heads of Primary or Secondary or their nominee, should conduct investigations (which can include preliminary or other inquiries and assessments) into all allegations or convictions and take appropriate action as a result, including reporting to the police, the Child Development Departments in the Federal and Lagos State Ministries of Women Affairs; the National Agency for the Prohibiting of Traffic in Persons (as applicable); National Council of Child Rights Advocates of Nigeria (NACCRRAN) and such other relevant agencies in Nigeria responsible for the protection of Child's rights; as well as possibly COBIS and CIS, the outcome of the School's investigation into a reportable allegation or conviction.

Should the Head of School and/or the Heads of School receive notice of allegations against any employees, their responsibility is to either respond to such allegations or arrange for a response from an appropriate senior staff member.

The Head of School and/or the Heads of School will be mindful of the School's "*Code of Conduct*" that is attached as Appendix C and outlines appropriate and inappropriate behaviour to assist staff and others to better understand the School's expectations in respect of its aim to eliminate any harm coming to children in its care.

The Head of School and the Heads of School are responsible for ensuring systems are in place for recording and responding to all allegations or convictions against an employee, including matters that are required to be notified to the police and other relevant Nigerian and International agencies.

The Head of School must:

- Ensure the implementation of this policy, all procedures and other related policies;
- Ensure everyone in the School community is fully aware of this policy;
- Ensure that all School personnel and Governors read the policy;
- Publish this policy on the School website and on the staff shared drive;
- Nominate a Governor for Child Protection;
- Ensure the Designated Safeguarding Leads undertake training in their role;
- Organise regular awareness training for all adults in the School community;
- Provide evidence for external evaluators that training has been effective and has been implemented;
- Provide adequate resources for the Designated Safeguarding Leads to undertake their role;
- Ensure a safer recruitment process is in place;
- Ensure Disclosure and Barring Services checks are undertaken for everyone working with children in School;
- Complete prohibition checks for everyone in teaching work and to check that no one is restricted from working as a teacher in another country;
- Ensure that all new staff undertake training in child protection procedures;
- Create and provide a learning environment that is safe, secure, warm and welcoming for children combined with sound security systems and procedures;
- Ensure that all CCTV cameras are periodically checked to ensure that they are all functioning;
- Have in place IT systems that will effectively filter the internet without over-blocking, and systems to monitor online usage;
- Seek advice from the British Embassy when the need arises;
- Help to create a culture within the School of listening to children;
- Keep up to date with all new guidance on safeguarding children;
- Keep the School staff up to date with any changes to procedures;
- Ensure all incidents are recorded, reported and kept confidential, keep all records up to date;
- Ensure that there is a smooth transition of responsibilities and information when a new Designated Safeguarding Lead takes over the role;
- Annually review the policy with the Heads of School.

Staff Members and Volunteers

As a member of staff or a volunteer of this School, your responsibility is to report to the Head of School and/or the Heads of School or to the Headmaster/CEO's nominee any situation where: -

- (a) you are aware that there has been an allegation of reportable conduct; or
- (b) you have formed a belief on reasonable grounds that a child is in danger of being subject to reportable conduct; or
- (c) a child is at risk of significant harm.

It is important to realise that failure to report allegations of reportable conduct or a suspicion of reportable conduct against a child who is enrolled at Grange School, based on reasonable grounds, is an offence under the UN Convention on the Rights of the Child, Child's Right Act 2003; the Constitution of the Federal Republic of Nigeria 1999 (as amended); the Child's Right Law 2007 and Child's Right Act Nigeria (Enforcement Procedure Rules 2015).

As a member of the School's staff you are not to investigate allegations or suspicions of reportable conduct. Investigations must only be carried out by investigators specifically appointed for the purpose.

Your responsibility is to report any allegations or evidence of reportable conduct only to the Head of School and/or the Heads of School or their nominee and discussion with others should be avoided or limited to persons in your privileged communication path (normal reporting line).

Failure to limit your communication in this way will not only be a breach of this Policy but may result in you not being protected under the law from potential civil proceedings for defamation.

The Head of School and/or the Heads of Primary and Secondary, or their nominee will report any matter that has been notified, as required by the relevant legislation and the Memorandum of Understanding mentioned in the Legislative Requirement section below. You will be advised of the action taken. If it is decided that there are not "reasonable grounds to suspect" a child is at risk of significant harm and consequently the matter is not going to be reported by the Head of School you are required to abide by the Head of School's final decision.

If a student discloses reportable allegations to you, you are obliged to report the disclosure as stated above but you must **not** investigate the matter. Investigation of allegations or evidence of reportable conduct must only be carried out by appointed investigators (usually the Head of School and/or the Designated Safeguarding Leads) whose duties will include informing parents or caregivers that a notification has been made. You should not make any contact with parents or caregivers regarding the notification unless specifically authorised to do so.

You may be required to report in a detailed manner on any matter regarding reportable conduct about which you have notified or been notified. The confidentiality of such a report will be maintained unless otherwise required by a Court Order. Information relating to any matter of reportable conduct will need to be recorded in a signed statement.

School staff and volunteers must:

- Recognise that child protection is their main responsibility and will 'always act in their best interests of the child';
- Remember to make a written record of all verbal conversations in instances of concern;
- Identify concerns early, provide help for children, and prevent concerns from escalating;

- Provide a safe environment in which children can learn;
- Treat children's welfare with utmost importance;
- Be made aware of this policy and all other safe guarding policies and procedures during induction, the school staff handbook and training;
- Attend regular awareness training on a wide range of safe guarding topics;
- Undertake training on how to respond to a child;
- Provide opportunities through the curriculum to address relevant issues and topics in order to promote their safety and wellbeing;
- Report to the Head of School any concerns that they have with another member of staff;
- Keep up to date with all changes in procedures; and
- Ensure that they conduct themselves correctly at all times and do not put themselves at risk.

Parents and Guardians

Parents and Guardians are:

- Asked to work with the School to establish excellent home-school relationships;
- Aware that we have a responsibility for the welfare of all our students;
- Aware that the school has a duty to advise external agencies if it has any concerns about a child;
- Aware that under certain circumstances the school will involve an agency without informing the parents/guardians if it thinks that by not doing so it will place the child at greater risk;
- Aware that they will be kept up to date with all actions taken by the school.

Annually we will ask parents and guardians if:

- They have any concerns about the safety of their child when at school;
- They feel enough time is given for children to learn how to keep safe;
- They know who to talk to if they have any concerns;
- They feel their views are listened to and acted upon.

3. Definitions

The various pieces of relevant legislation, agency guidelines and other publications, contain definitions of a number of terms and those relevant for the School's purposes are summarised below. These definitions may alter, and reference should always be made to the source document for the latest content.

Allegation

An allegation against an employee might involve behaviour that is reportable conduct or behaviour that is exempt from notification to the police or other relevant authorities but is required to be investigated by the School.

Restraining Order (Interim Protection Order)

A restraining order (Interim Protection Order) can be made on application at the nearest police station where one can lodge a police report against the relevant offender or directly to the relevant Department of Social Welfare under the Lagos State Ministry of Women Affairs.

The police will undertake an assessment and make referral to the relevant Department of Social Welfare for the protection of a child (or a child and others).

Behaviour that causes psychological harm

Behaviour that causes psychological harm is conduct that is obviously or very clearly unreasonable and results in significant emotional harm or trauma to a child. There needs to be a proven causal link between the inappropriate behaviour and the harm, and the harm must be more than transient.

Behaviour that does not constitute reportable conduct

Allegations against employees, that are exempt from notification to the relevant external authorities, are:

- (a) conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children and to any relevant codes of conduct or professional standards; or
- (b) the use of physical force that, in all the circumstances, is trivial or negligible, but only if the matter is to be investigated and the result of the investigation recorded under workplace employment procedures.

Examples of conduct that would not constitute "reportable conduct" include:

- touching a child in order to attract a child's attention to guide a child or to comfort a distressed child;
- a teacher raising his or her voice in order to attract attention or to restore order in the classroom;
- conduct that is established to be accidental;
- providing appropriate medical care to a child who is hurt;
- not providing supervision where this was for good reason, and for a short period of time and where the risk of harm was reasonably perceived at the time to be low;
- actions found to have been appropriate physical contact in classes such as sport, drama, dance etc.

Child

Under the adopted Nigerian Child Rights Act 2003, all children and young people up to the age of 18 years are defined as children.

Conviction of reportable conduct

This means any conviction of a person, in Nigeria or elsewhere, of an offence involving reportable conduct, and includes a finding by a court that a charge for such an offence is proven even though the court does not proceed to a conviction.

Disqualified Person

Grange School must not employ an individual if they are:

- (a) a person convicted of any crime against children before, on or after the commencement of employment;
- (b) a person against whom proceedings for any such offence have been commenced, if the offence was committed as an adult, pending determination of the proceedings for the offence.

Employee

An employee is any person who is employed by the School, whether or not they are employed to work directly with children, as well as anyone from outside the School who is engaged to provide services to children such as contractors, volunteers, students on placement, instructors of religion, sports coaches, visiting musicians, voluntary non-student members of theatrical production.

Grooming behaviour

Behaviour should only be seen as 'grooming' where there is evidence of a pattern of conduct that is consistent with grooming the alleged victim for sexual activity and that there is no other reasonable explanation for it. The types of behaviours that may lead to such a conclusion include (but are not limited to) the following:

- Persuading a child or group of children that they have a 'special' relationship, for example by:
 - spending inappropriate special time with a child;
 - inappropriately giving gifts;
 - inappropriately showing special favours to them but not other children;
 - inappropriately allowing the child to overstep rules;
 - asking the child to keep this relationship to themselves.

Testing boundaries, for example by:

- undressing in front of a child;
 - encouraging inappropriate physical contact (even where it is not overtly sexual);
 - talking about sex;
 - 'accidental' intimate touching.
- Inappropriately extending a relationship outside of work (except where it may be appropriate - for example where there was a pre-existing friendship with the child's family or as part of normal social interactions in the community).
 - Inappropriate personal communication (including emails, telephone calls, text messaging, social media and web forums) that explores sexual feelings or intimate personal feelings with a child.

An adult requesting that a child keep any aspect of their relationship secret or using tactics to keep any aspect of the relationship secret, would generally increase the likelihood that grooming is occurring.

For the purposes of notification to the Head of School and/or the Heads of Primary and Secondary grooming behaviour constitutes a form of sexual misconduct and is notifiable.

Internal investigation of an allegation

This involves a process where the School:

- gathers all relevant facts
- makes a decision as to whether an allegation is sustained or not
- provides information to assist any relevant employment proceedings.

Neglect

Neglect occurs when a child is harmed by the failure of a person whose job includes care responsibilities towards a child, to provide basic physical and emotional necessities of life, including failure of such a person to provide or arrange for the provision of adequate and proper food, nursing, clothing, medical attention or lodging for a child in that person's care.

Physical assault

Using common law principles, physical assault must include all three of the following elements:

- it is an act committed on or towards a child; and
- it involves either the application of force to a child or an act that causes a child to think that immediate force will be used on them; and
- it is either hostile or reckless (a reckless act is one where the person foresees the likelihood of inflicting injury or fear, and ignores the risk).

Actual physical harm does not have to occur in order for an assault to have taken place, i.e. the child does not have to be injured. Physical contact which is an inevitable part of everyday life does not amount to an assault.

Reportable allegation

An allegation of reportable conduct against a person or an allegation of misconduct that may involve reportable conduct and must include:

- identification of a person who is a current employee of the School;
- an alleged offence or description of offending behaviour that meets the definition of reportable conduct;
- a person who was a child at the time of the alleged offence or behaviour described.

All allegations (including anonymous allegations) of reportable conduct must be reported to the Head of School and/or the Heads of Primary and Secondary.

Complaints that form the basis of less serious allegations i.e. non-reportable conduct will be dealt with in accordance with the relevant School Policy and the School's other legal obligations.

Reportable conduct

- any sexual offence, or sexual misconduct, committed against, with or in the presence of a child (including a child pornography offence), or
- any assault, ill-treatment or neglect of a child, or
- any behaviour that causes psychological harm to a child, whether or not, in any case, with the consent of the child.

Risk Assessment

It is the analysis of the facts and circumstances known to the Head of School and/or the Heads of School when he/she is made aware of allegations of reportable conduct to determine whether any measures need to be taken for the safety and welfare of all concerned.

Risk of Significant Harm

A child or young person is "at risk of significant harm" if current concerns exist for the safety, welfare or well-being of the child or young person because of the presence of any one or more of the following circumstances:

- a) the child's or young person's basic physical or psychological needs are not being met or are at risk of not being met,
- b) the parents or other caregivers have not arranged and are unable or unwilling to arrange for the child or young person to receive necessary medical care,
 - (b1) in the case of a child or young person who is required to attend school in accordance with the Universal Education ACT 2004 (as amended), the parents or other caregivers have not arranged and are unable or unwilling to arrange for the child or young person to receive an education in accordance with that Act,
- (c) the child or young person has been, or is at risk of being, physically or sexually abused or ill-treated,
- (d) the child or young person is living in a household where there have been incidents of domestic violence and, as a consequence, the child or young person is at risk of serious physical or psychological harm,
- (e) a parent or other caregiver has behaved in such a way towards the child or young person that the child or young person has suffered or is at risk of suffering serious psychological harm,
- (f) the child was the subject of a pre-natal report and the birth mother of the child did not engage successfully with support services to eliminate, or minimise to the lowest level reasonably practical, the risk factors that gave rise to the report.

Note: Physical or sexual abuse may include an assault and can exist despite the fact that consent has been given.

Sexual Offence

The term 'sexual offence' encompasses all criminal offences involving a sexual element that are 'committed against, with or in the presence of a child'.

These offences include (but are not limited to) the following:

- indecent assault
- sexual assault
- aggravated sexual assault
- sexual intercourse and attempted sexual intercourse

- possession/ dissemination/ production of child pornography or child abuse material
- using children to produce pornography
- grooming or procuring children under the age of 16 years for unlawful sexual activity
- deemed non-consensual sexual activity on the basis of special care relationships.

All cases involving a sexual offence would also involve sexual misconduct.

Sexual Misconduct

The term 'sexual misconduct' includes conduct that does not necessarily equate to a criminal offence. For sexual misconduct to constitute reportable conduct, the alleged conduct must have been committed against, with or in the presence of a child.

There are three categories of sexual misconduct in addition to sexual offences:

- crossing professional boundaries
- sexually explicit comments and other overtly sexual behaviour, and
- grooming behaviour (see definition above).

Crossing professional boundaries:

Sexual misconduct includes behaviour that can reasonably be construed as involving an inappropriate and overly personal or intimate:

- relationship with;
- conduct towards; or
- focus on;

a child or young person, or a group of children or young persons.

In the area of 'crossing professional boundaries', particular care should be exercised before making a finding of sexual misconduct. For example, an employee who, on an isolated occasion, 'crosses professional boundaries' in a manner that involves little more than poor judgement could not be said to have engaged in sexual misconduct.

Also, in cases where an employee has 'crossed boundaries' in terms of their relationship with a child, if there is evidence which clearly shows that the employee did not seek to establish an improper relationship with the involved child, then this does not constitute sexual misconduct.

However, persistent less serious breaches of professional conduct in this area, or a single serious 'crossing of the boundaries' by an employee, may constitute sexual misconduct, particularly if the employee either knew, or ought to have known, that their behaviour was unacceptable.

Allegations of abuse by one or more pupils against another pupil (Peer on Peer Abuse)

Any member of the school community may become aware of a pupil in distress, or suspicious that a pupil may have been maltreated by one or more pupils. All forms of peer abuse, including sexting, will not be tolerated. Such behaviour cannot be passed off as 'banter' or a 'part of growing up'. It makes no difference whether the abuse is suspected or alleged to be taking place at home, at school or elsewhere. Whether parents, relations, staff, other adults, or pupils may be involved, the welfare of the pupil at risk is the first priority.

If there is reasonable cause to suspect that a pupil is suffering, or likely to suffer, significant harm the School's safeguarding reporting procedures should be used. This includes such abuse as would be referred to the local authority as a child protection concern. In addition, the School's Behaviour Policy would be applied where appropriate. Victims of peer abuse will be supported in line with the school's welfare policy.

Allegations Against another Pupil

Where a child protection allegation or cause for concern is made by one pupil against another pupil this will be dealt with in the first instance in accordance with the steps laid down in our Anti-bullying policy. If it appears that the matter is too serious to be dealt with in this manner it should be reported immediately to the school's Designated Safeguarding Leads

The School's Code of Conduct Appendix C outlines the nature of the professional boundaries which should exist between employees and children/young people. For employees who either intentionally breach that code or have demonstrated an inability to apply it appropriately, it may be necessary for the staff member's Senior Manager to provide more detailed written advice about what constitutes appropriate behaviour.

Sexually explicit comments and other overtly sexual behaviour

Sexual misconduct includes a broad range of sexualised behaviour with or towards children. While it is not possible to provide a complete and definitive list of unacceptable sexual conduct involving children, the following types of behaviour give strong guidance:

- sexualised behaviour with or towards a child (including sexual exhibitionism)
- inappropriate conversations of a sexual nature
- comments that express a desire to act in a sexual manner
- unwarranted and inappropriate touching involving a child
- personal correspondence and communications (including emails, social media and web forums) with a child or young person in relation to the adult's romantic, intimate or sexual feelings for a child or young person
- exposure of children and young people to sexual behaviour of others including display of pornography
- watching children undress in circumstances where supervision is not required, and it is clearly inappropriate.

Vexatious

Where enquiries into the matter find that the allegation was made without substance and with the intent of being malicious or to cause distress to the person against whom the allegation was made.

Working with Children Clearance

Staff are required to obtain a DBS (Disclosing and Barring Service) certificate and a National Police check/clearance from their country of origin and/or where they have been working/living prior starting their job at Grange School, due to their direct responsibility for children or: -

(a) the requirement or ability of all School staff to have face to face contact with children in the School's care; or

(b) the nature of their role may enable them to have access to a child's personal information.

5. Prevention

This School clearly opposes any practice that involves conduct of a reportable nature and will be constantly looking to implement measures and strategies that are aimed at preventing reportable conduct and other harm coming to children in its care. These measures and strategies will include: -

- developing and reviewing strategies to minimise reportable conduct occurring;
- requiring employees to sign off their acknowledgment and understanding of this Policy to protect children;
- ensuring this Policy is dated and contains a date when it will be reviewed;
- adopting the attached "*Code of Conduct*" (Appendix C) that assists staff in understanding appropriate and inappropriate behaviours;
- over a period of time clearly defining each person's current role within the organisation;
- identifying people who are not suitable to work with children through implementing thorough employment procedures including reference checking, pre-employment screening and detailed questioning at interviews;
- providing information to families and the community on the child protection strategies that have been adopted by the School;
- training for employees to promote best practices and to ensure a safe environment for children and employees, and
- raising awareness in the School community about child protection by displaying where appropriate brochures, posters or other means of communication;
- encouraging members of the School Community to make constructive contributions as to how this Policy and the foregoing measures and strategies can be improved.

6. Response to Allegations

When responding to allegations, the Head of School and/or the Heads of School will be mindful of confidentiality and report each relevant case as required.

The Child Protection Committee will be convened by the Head of School to notify all members of the situation and/or possible allegations. From here the investigative process will be followed with information reported back to the Committee.

The Grange School Child Protection Committee includes the following staff:

- The Head of School– Ms Abra Stoakley;
- The Head of Primary and Secondary School – Mrs Griffiths (P) & Mrs Oladeji (S);
- The Head of Pastoral Care/Wellbeing Primary & Secondary School (Trained Designated Safeguarding Leads) – Mrs Sotunde (S) & Mrs Igbokwe (P);
- The School Counsellors (Trained Designated Safeguarding Leads) – Mrs Thompson (P) & Ms Oduseso (S);
- A Member of the Governing Council – Mrs Taiwo.

<p>house with timelines and actions recorded and kept with the file.</p> <p style="text-align: center;">↓</p>	<p>and contacts the appropriate agencies and includes the School Governing Council as necessary.</p> <p style="text-align: center;">↓</p>
<p>Case details maintained on file and new developments noted. A case is never closed; simply filed. Reviews can take place as necessary.</p> <p style="text-align: center;">↓</p>	<p>External agencies take the lead in the case and the Head of School and relevant members of staff work cooperatively with them.</p> <p style="text-align: center;">↓</p>
<p>The School will store all of the relevant information in a Child Protection case file in a “double locked” secure place in the Head of School’s office.</p> <p style="text-align: center;">↓</p>	
<p style="text-align: center;"><i>ALL RECORDS MUST BE KEPT UNTIL SUCH TIME AS THE INDIVIDUAL HAS REACHED 25 YEARS OF AGE.</i></p>	

8. Risk Assessment

With the abovementioned process in mind the DSLs and/or the Heads of Primary or Secondary or their nominee will:

- conduct an initial and subsequent risk assessment, including an assessment of the safety of the child(ren) concerned;
- decide what action, if any, e.g. suspension, is to be taken regarding the employee who has had an allegation made against them, and
- assess and monitor the risk of continued access of the employee (who has had an allegation made or conviction recorded against them), to children attending the School.

9. Documentation and Record Keeping

All documents held by the School and relating to an allegation or conviction of reportable conduct or details of behaviour that does not constitute reportable conduct will be kept on a strictly confidential basis.

The Head of School will be responsible for keeping and storing all records relating to all matters addressed by this Policy and only those persons whom the School is obliged to advise of this information or need to be aware of the contents of such documents will have access to them.

10. Support Available for All Parties

The School's Pastoral Welfare Services that include the School Counsellor are available to support children involved in matters of this nature. Similarly, staff are able to call upon their colleagues for pastoral support along with any external anonymous counselling services.

Attached are *"Guidelines to Assist a Child or Young Person who has Disclosed Reportable Allegations"* (Appendix B) that seeks to assist staff in understanding the approach that should be taken when a child or young person reveals abuse to you.

11. Training

The School is also committed to updating staff on policy and procedures on an annual basis at the beginning of each academic year, so that all those working with children understand their responsibilities and are familiar with expected practice.

12. Review Date

The School will review this Policy and associated documents within twelve months and reissue a further version if necessary. Any suggested improvements should be forwarded to the Head of School Whilst the School will strive to ensure it has a robust and effective "Child Protection Policy" it is also recognised that this Policy and the School are unable to exceed any statutory obligation upon the School.

Appendices

Appendix A

Recommended Protocols for Internal Investigative and Disciplinary Proceedings

Introduction

It is acknowledged that each case of alleged reportable conduct which requires internal investigation and possible disciplinary action will be quite different. These protocols have been compiled to advise how investigations and disciplinary proceedings may be conducted. They are guidelines only and in applying them one should always bear in mind the primary objectives of the relevant legislation. If adopted by a school this document should be provided to staff who are the subject of an internal investigation into reportable conduct.

Outline of Obligations under the Legislation

Upon receipt of an allegation of reportable conduct against an employee, the Head of School should determine whether or not it is an allegation about reportable conduct that may involve misconduct.

All allegations against employees that involve reportable conduct must be reported within 30 days of receipt of the allegation to the School's investigative committee. The allegations should also be reported to the relevant Child Protection Service under the Lagos State Ministry of Women Affairs if there is a current concern for the safety, welfare and well-being of the child. Child Protection Service under the Lagos State Ministry of Women Affairs.

The Head of School will need to:

- conduct or cause to be conducted, an investigation of the allegation;
- decide as to whether on the balance of probabilities the allegation has been sustained or not sustained;
- decide on the disciplinary action, if any, to be taken against the employee.

At the conclusion of the investigation and the decision regarding disciplinary action, a complete report including the findings, disciplinary action decided upon and any other recommendations must be forwarded to the Schools Governing Council and Board of Directors together with any information which the accused person requires to be included.

Completed relevant disciplinary proceedings should be reported to the relevant Child Protection Service under the Federal and Lagos Ministry of Women Affairs, unless the allegation was found to be false, vexatious or misconceived.

Risk Assessment

Upon the receipt of an allegation of reportable conduct against an employee, the Head of School and/or the Heads of School are responsible for carrying out an initial risk assessment prior to the investigation of the allegation. The purpose of the risk assessment is to identify and minimise the risk:

- to a child or children who are alleged to have been victims of the reportable conduct;
- to the employee against whom the allegation has been made;
- to other children with whom the employee may have contact;
- to the proper investigation of the allegation.

This may result, for example, in the employee being temporarily relieved of some duties, being required to avoid certain pupils or, in some special cases, being suspended from duty. Any decision to take action as a result of a risk assessment is in no way an indication of the guilt of the employee concerned.

The factors which should be considered during the risk assessment include:

- the nature of the allegation;
- vulnerability of children;
- nature of the position occupied by the employee;
- the level of supervision of the employee;
- disciplinary history of the employee;
- safety of the employee;
- any comments made by the employee.

Risk should be continually monitored throughout the investigation.

The Investigation

In conducting an investigation into allegations of reportable conduct, the Head of School and/or the Heads of Primary or Secondary should be guided by the following principles.

1. Conflict of Interest and Appointment of Investigator

All investigations must be conducted in an impartial, independent and objective manner and be open and transparent. The investigator must not show bias or favour to the alleged victim(s), the person the subject of the allegation, nor in outcomes which might affect the reputations of the particular agency.

In some instances, the Head of School may call on an external expert to undertake the investigation. This may be the case where the agency determines that it does not have the expertise to satisfactorily conduct the investigation or in cases where a conflict of interest or bias may arise.

The mere perception of a conflict of interest by an accused person is not sufficient in itself to require the appointment of an external investigator. However, if there is a clear history of conflict between the proposed investigator and the employee it would be advisable for another investigator to be appointed.

2. Confidentiality

The Head of School and persons conducting investigations should maintain a high level of confidentiality throughout the investigation phase. Action for defamation could result in situations in which agencies have published allegations of reportable conduct against an employee.

The person making the allegation also has a right to protection, and if appropriate, confidentiality. In a limited number of circumstances, it may be inappropriate to advise the accused person of the identity of the person making the allegation.

The employee should not discuss the allegations with students (including the alleged victim) nor with parents without the approval of the School.

3. Steps in the Investigative Process

A proper investigation usually requires that an employee against whom an allegation has been made, be told promptly the substance of the allegation and be given the right to reply to the allegation.

If the relevant Child Protection Authority under the applicable Ministry of Women's Affairs or police are investigating the allegation, advice should be received from them about when to inform the employee about details of the allegation. Otherwise, the decision of when to inform the employee will depend on the protection of notifiers and witnesses, the quality of evidence to be obtained and the possibility of prejudicing the conduct of the investigation.

Where possible employees should be given advance notice of an interview with the Head of School or an appointed investigator, details of the allegation (sufficient to allow the employee to respond) and be advised that they may have a witness at the interview.

While it is desirable for an employee to be given reasonable notice before being required to respond to an allegation, what constitutes reasonable notice will depend on the circumstances of the situation.

Employees may wish to have someone support them during the interview process. The support person may be a friend on staff or the chapter representative. However, such a person is there for support only and as a witness to the proceedings, and not as an advocate or to take an active role in the proceedings.

A record should be kept of the meeting; this could be made by a tape recording, a full written record or short minutes. The form of record may be dependent on the seriousness of the allegation.

Listed below are fundamental steps in the investigative process. These may need to be varied on occasions to meet particular circumstances. The employer should normally:

- (a) clarify the allegation and determine that it is an allegation of reportable conduct;
- (b) make appropriate notifications to the relevant department of the Ministry of Women Affairs and the police;
- (c) carry out a risk assessment;
- (d) collect all available relevant information (ensure full documentation);
- (e) interview all relevant witnesses (ensure all interviews are adequately recorded);
- (f) make the employee fully aware of the allegations;
- (g) possibly give the employee access to relevant documents on which the employer is relying, unless such documentation needs to be kept confidential;
- (h) interview the person the subject of the allegations (ensure procedural fairness);
- (i) consider all the evidence and make a preliminary finding as to whether the allegation is sustained or not sustained.

Findings

At the conclusion of the investigation, the investigator will make a preliminary finding on the balance of probabilities that:

1. the allegation was false; or
2. the allegation was vexatious, that is, was made without substance and with the intent of being malicious or to cause distress to the person against whom the allegation was made; or
3. the allegation was misconceived, that is, whilst the allegation was made in good faith it was either without substance or a misunderstanding on behalf of the person making the allegation occurred or the incident would not reasonably be considered as reportable conduct (irrespective of the definition), sexual misconduct or an act of violence; or
4. the allegation was not sustained; or
5. the allegation was not one of reportable conduct, but might constitute a breach of professional behaviour or judgment which requires further professional disciplinary action; or
6. the allegation was sustained, and the matter required disciplinary action.

A finding of 'not sustained' means that the investigator considers that there is insufficient evidence to determine that the alleged event occurred, on the balance of probabilities.

The employee should be told of the preliminary finding and given an opportunity to respond including, if they wish, in writing.

Disciplinary Proceedings

For the purpose of this recommended protocol disciplinary proceedings are defined as the action taken as a consequence of the findings arising out of the investigation. When conducting

disciplinary proceedings, the employer should have regard to procedural fairness. This will usually involve:

- giving the employee details of the final finding;
- informing the employee of the possible action the employer may take; and
- giving the employee a right to respond including, if they wish, in writing.

When the investigation has been completed:

- the employee is entitled to ask the Head of School to review the investigation and findings if the employee believes the investigation was unfair, biased, incomplete or suffered some other deficiency giving rise to an incorrect finding.
- the employee must be advised if the employer has notified the police or any other relevant authority of the allegations and disciplinary proceedings completed.
- if the completed disciplinary proceedings are transmitted to the Nigerian Child Protection Authority and/or police, the employee may be entitled to inspect the employer's file in accordance with Freedom of Information Act 2011 (and such other amends of the Act), subject to any exemptions which may apply under that Act.

Appendix B

Guidelines for Staff Assisting a Child or Young Person who has Disclosed Abuse

When a student discloses abuse, staff need to be well prepared so that they can be supportive of the student and at the same time be very clear about their responsibility which in the first instance is to report to the Head of School and/or the Heads of School and not investigate. However, when in a one-to-one situation, children generally disclose with great hesitation and often with a mix of intense emotions, including fear, embarrassment and guilt. Sometimes they may only hint at or tell a small part of their experience to see how the staff member reacts before fully disclosing. It is essential that the staff member remains calm and supportive of the student.

The staff member should:

- (a) actively listen to the student and never probe for details or ask leading questions: e.g. “Did s/he touch your vagina/penis?”;
- (b) refrain from questioning excessively through fear of making a mistake in deciding to notify;
- (c) talk gently and reassuringly, in private, pointing out that you are there to help;
- (d) only ask questions that are open-ended and designed to provide sufficient information to decide whether the suspicion of abuse is sufficiently strong to warrant a report being made e.g. what happened then?.

Members of staff will help a student making a disclosure by:

- (a) listening in a calm way
- (b) reassuring the student that you believe him
- (c) saying that you are pleased that the student has told you as it was the right thing to do
- (d) avoiding any reaction that could make the student regret having talked about the experience
- (e) emphasising that what has happened is definitely not the student’s fault
- (f) acknowledging that it is very hard to talk about such things
- (g) telling the student that the best way to stop the abuse happening is to report it to the people who have the responsibility for the care and protection of children.

When a student discloses:

- (a) do not make promises that you will not tell anyone; in fact, you must tell the child that you have a responsibility to tell the Head of School
- (b) never assure the child that the abuse will stop, as that cannot be guaranteed.

Inter-agency Guidelines emphasise the importance of *“being honest with the child about your responsibility for taking action to protect them and what is likely to happen. {However} it is important not to do anything that may make the situation worse and cause further harm to the child by asking probing questions, accusing parents or discussing the circumstances of the*

notification with potential witnesses or colleagues” (Inter-agency Guidelines for Child Protection Intervention).

Responding to a disclosure made in a group or classroom

If a student begins to make a disclosure in a group situation use the strategy of ‘protective interruption’ by:

- (a) acknowledging that you have heard the child
- (b) indicating your support by explaining that what you think they are saying sounds important and that it would be better to talk about it later.

Appendix C

**GRANGE SCHOOL
CODE OF CONDUCT
for the
CARE AND PROTECTION OF CHILDREN**

CONTENTS:

1. Introduction
2. The Legislative Context
3. Duty of Care and Legal Liability
4. General Guidelines

1. Introduction

The care and protection of children according to the parameters set out in this policy is consistent with the philosophy of the Convention on the Rights of the Child (CRC), the International Legal Instruments including the UN Rights of the Child (ICMEC), The Child's Right Act 2003; the Constitution of the Federal Republic of Nigeria 1999 (as amended); the Child's Right Law of Lagos State 2007; and the The Childs Right Act (Enforcement Procedure Rules 2015), and the Department for Education Keeping Children Safe in Education: Statutory Guidance for UK Schools (2020) and is both complex and sensitive.

Child Protection Legislation requires agencies to develop a Code of Conduct which will apply to its employees. Such a Code should help establish parameters for employees who work in child related employment. This Code of Conduct has therefore been formulated to identify to staff the type of conduct that is required of them in the way they deal with children in the performance of their duties. It is also intended to provide practical assistance for staff members if they encounter ethical problems.

Staff have been involved in the development of this Code to ensure ownership. Just as important is the need to regularly review this Code to ensure currency and to reinforce with staff their obligations under the Code and current child protection legislation.

This Code may require amending over time. The School welcomes the input of its staff in assisting to fine tune this Code in the light of your experience. Any concerns or questions are welcomed and should be directed to the Head of Schooland/or the Heads of School as they will help us to refine the Code to meet the needs of the School.

2. The Legislative Context

Everyone who is concerned in a professional capacity with the care and protection of children needs to have a clear understanding of the essential elements of the law as it applies to the care and protection of children.

3. Duty of Care and Legal Liability

Staff can be deemed legally liable if they have been negligent in relation to their responsibilities under the legislation as it pertains to the care and protection of children.

Generally speaking, a person owes a duty not to injure another as a result of his or her own negligent act or omission. The duty does not usually extend to the taking of steps to prevent injury where one has not caused or contributed to the risk giving rise to the injury.

There exists, however, special duty relationships between some members of our society which give rise to more onerous duties of care. The relationship between teacher and pupil is one of these.

The general law of negligence provides that a person may be negligent if:

- S/he owes a duty of care to the person injured, that is, the standard judged reasonable in all of the circumstances, and
- S/he did not carry out that duty to the legal standard required, and
- The person suffered damage as a result of the failure to observe the duty of care.

With regard to care and protection the following general principles apply:

- Staff must take reasonable care to ensure that their students are not harmed. They have a duty to protect their students against foreseeable risks of personal injury or harm.
- The standard of care is that of a reasonably prudent parent. The degree of care depends on such factors as the age of the students.
- There must be an efficient system of supervision in operation in the School.

Duty of care applies while the students are under the care of the School. This applies equally to School based activities and out of School activities. The same duty of care applies to employees who volunteer their services to the School.

Employees are required to follow good standards and approved practice. An example of good standards or approved practice would be compliance with the School's Code of Conduct.

4. General Guidelines

The School is committed to the achievement of the highest standards of education in which the security, protection and comfort of students is a high priority. The following guidelines are to be adopted for the care and protection of students and staff.

4.1 Supervision of Students

- (a) Staff must take all reasonable care to ensure that no student is exposed to any unnecessary risk of injury. Staff are to remember that they are in *loco parentis* - the standard of care required is that of a skilled professional.
- (b) Staff should be familiar with and adhere strictly to the School's evacuation procedures.
- (c) Ill or injured students should be attended to by the supervising staff member. Should additional assistance be required contact should be made with the School office. The supervising staff member will need to determine in light of the circumstances whether the School's First aid room or Ambulance service should be contacted for further assistance.
- (d) Students should not be left unsupervised either within or outside of class. Staff are reminded of their duty of care obligations in this regard. Staff should be punctual to class and allocated supervision.

(e) It is recognised that if individual music tutors must work with students alone in enclosed rooms. External monitoring is made possible with a glass panel window in each classroom door.

(f) In the event that a student is not collected, staff should remain with the student until collected or return to School with the student, or put in place other measures which are prudent and necessary.

(g) Playground supervision is an integral part of the responsibility of staff and they must be punctual. It must take precedence over other activities. Staff should actively supervise their designated area, being vigilant and constantly moving around.

(h) Staff should be alert to bullying or any other form of discriminatory behaviour, and report incidences to the appropriate staff member.

4.2 Relationships with Students

(a) Staff should avoid situations where they are alone in an enclosed space with a student. Where staff are left with the responsibility of a single student they should ensure that this is in an open space in view of others. Where this is not possible or practical it should be discussed with the immediate supervisor.

(b) Staff may as part of their pastoral care role engage in discussion with students. This is entirely appropriate. However, staff must be cautious of making personal comments about a student or asking questions that probe their own or a student's sexuality or relationships.

(c) When staff wish to conduct a private conversation with a student they should consider the time and venue carefully to avoid placing themselves in a vulnerable situation. It is preferable to leave the door open. The staff member should not locate themselves between the student and the door.

(d) Staff should never drive a student in their car. In the event of an emergency staff should exercise discretion but then report the matter to the appropriate supervisor.

(e) Staff should notify the Head of School and/or the Heads of Primary or Secondary immediately, should they suspect a situation involving any form of reportable conduct. It is not a staff responsibility to investigate. Similarly, staff should report to the Head of School and/or the Heads of Primary or Secondary any suspected case of neglect.

(f) Social relations between staff and students outside the School can be problematic. Staff should refrain from visiting students at their home unless they have the express permission of the Head of School and/or the Heads of Primary or Secondary and/or relevant parents or guardians. Staff must be alert to the risk involved in social relations with students and be conscious that their position places extra obligations on them.

(g) Staff should not engage in tutoring or coaching students from the school for monetary return unless approved by the Head of School.

(h) When physical contact with a student is a necessary part of the teaching/learning experience staff must exercise caution to ensure that the contact is appropriate and acceptable. Staff could check with the student first to see if the student was comfortable with the proposed contact or ask for a volunteer to demonstrate a particular activity.

(i) Whilst teachers will generally not attend to the toileting needs of young children should the need arise it will be done with caution. It may be appropriate to have the door open. In respect to students with a disability the management of toileting needs should be included in the student's individual management plan.

(j) Staff should not supply or condone the use of alcohol, tobacco other non-prescription drugs or illegal substances for any student in their care except for pain relieving medicines, e.g. Panadol, that they are permitted to administer.

(k) When congratulating a student, a handshake, pat on the shoulder or brief hug are acceptable as long as the student is comfortable with this action. Kissing of students is not acceptable.

(l) Assessing a student who is injured or ill may necessitate touching. Always advise the student of what you intend doing and seek their consent.

(m) Staff must always treat students with respect and without favouritism. There is no place for sarcasm, derogatory remarks, inappropriate familiarity or offensive comments.

(n) Staff who communicate with students electronically must abide by the terms of the School's Computer/Internet Policy. Transmission of messages or files which are sexually explicit, or offensive are totally inappropriate, and may be grounds for dismissal.

(o) Sometimes during the course of your work you may be in receipt of a gift from a student. In such circumstances where the receipt of a gift could be considered outside of usual custom you are to inform your immediate supervisor. In respect to gifts you should also be mindful of any School Gifts Policy.

(p) Staff should not communicate with students on social networking sites, such as Facebook, Twitter, or Instagram.

(q) Staff should ensure that they are familiar with and adhere to the School's Policy in regard to the storage and administration of medical products to students.

(r) Sometimes in ensuring duty of care staff may be required to restrain a student from harming himself or others by using reasonable force. Any such strategy must be in keeping with the School's behaviour management practices.

4.3 Discipline of Students

- (a) All staff should be familiar with and adhere to the School's Discipline (Behaviour) Policy.
- (b) Alcohol is not to be consumed by staff at School camps or excursions. The only exceptions will be those occasions deemed appropriate by the Head of School in accordance with the relevant School Policy (refer to Staff Handbook).
- (c) No student should be allowed to leave or be sent from a class other than for personal hygiene matters. In extreme cases students can be sent to the Heads or Deputy Heads of Primary or Secondary office.
- (d) At all times when speaking with students' care must be taken to use appropriate language.

4.4 Communication Issues

- (a) Staff are required to respect and adhere to the established lines of communication in the School.
- (b) Staff should be mindful of confidentiality when in discussion with parents. Staff can never guarantee confidentiality if the matter under discussion requires mandatory reporting.
- (c) Staff should not speak inappropriately about another staff member to students or parents.
- (d) Staff should present a courteous professional manner to students, parents, visitors and other staff members. Confrontation and criticism in public is to be avoided at all times.
- (e) Certain matters discussed in staff meetings and staff memos will be treated as confidential and should not be discussed with students unless relevant to students.
- (f) The media should not be given access to students or allowed entry to the School without the express permission of the Headmaster/CEO.

4.5 Camps/ Excursions/Overseas Trips

- (a) In the case of activities involving overnight accommodation of boys and girls, both genders should be represented in the group of supervisors.
- (b) Excursion information must be communicated to parents.
- (c) A mobile phone must be taken on all excursions. The teacher in charge must arrange to have access to a complete list of student contact numbers with them on the excursion.

(d) A co-ordinator/leader will be appointed to oversee billeting/camp arrangements. The co-ordinator will ensure that lines of communication are known to all students, their parents and host families.

(e) Students being billeted should have access to supervising staff. The overriding principle is 'to act in the best interests of the child'. If the child expresses discomfort, or unease the child will be counselled, and appropriate action taken including immediate removal from the situation.

(f) Parents of students to be billeted must complete consent forms and if necessary update the School's medical information forms.

(g) Risk Management Assessment and Insurance arrangements must be completed well in advance of an interstate or overseas excursion.

4.6 Duty to Disclose

(a) Staff are required to report to the Head of School and/or the Heads of Primary or Secondary any allegation of 'reportable conduct'.

(b) Staff who are the subject of an Apprehended Violence Order or a Reportable Conviction are required to inform the Head of School immediately they are in receipt of such an Order or Conviction.

(c) Staff are required to report to the Head of School and/or the Heads of Primary or Secondary or their nominee any concerns relating to the safety, welfare or wellbeing of a student.

4.7 Indicators of Harm

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

Indicators in the child

Bruising

It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Bruising in or around the mouth;
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive);
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas;

- Variation in colour possibly indicating injuries caused at different times;
- The outline of an object used e.g. belt marks, hand prints or a hair brush;
- Linear bruising at any site, particularly on the buttocks, back or face;
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting;
- Bruising around the face;
- Grasp marks to the upper arms, forearms or leg;
- Petechiae haemorrhages (pinpoint blood spots under the skin.) Commonly associated with slapping, smothering/suffocation, strangling and squeezing.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress. If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent;
- There are associated old fractures;
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.

Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.

Skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.

Mouth Injuries

Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.

Poisoning

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm even in young children.

Fabricated or Induced Illness

Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- Discrepancies between reported and observed medical conditions, such as the incidence of fits;
- Attendance at various hospitals, in different geographical areas;
- Development of feeding / eating disorders, as a result of unpleasant feeding interactions;
- The child developing abnormal attitudes to their own health;
- Non-organic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause;
- Speech, language or motor developmental delays;
- Dislike of close physical contact;
- Attachment disorders;
- Low self-esteem;
- Poor quality or no relationships with peers because social interactions are restricted;
- Poor attendance at school and under-achievement.

Bite Marks

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid.

Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

The following points are also worth remembering:

- A responsible adult checks the temperature of the bath before the child gets in;
- A child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his or her feet;
- A child getting into too hot water of his or her own accord will struggle to get burned but there will be splash marks.

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, or unusually shaped, may suggest abuse.

Emotional/behavioural presentation

- Refusal to discuss injuries;
- Admission of punishment which appears excessive;
- Fear of parents being contacted and fear of returning home;
- Withdrawal from physical contact;
- Arms and legs kept covered in hot weather;
- Fear of medical help;
- Aggression towards others;
- Frequently absent from school;
- An explanation which is inconsistent with an injury;
- Several different explanations provided for an injury.

Indicators in the parent

- May have injuries themselves that suggest domestic violence;
- Not seeking medical help/unexplained delay in seeking treatment;
- Reluctant to give information or mention previous injuries;
- Absent without good reason when their child is presented for treatment;
- Disinterested or undisturbed by accident or injury;
- Aggressive towards child or others;
- Unauthorises attempts to administer medication;
- Tries to draw the child into their own illness;
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault;
- Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids;
- Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care;
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child;
- Wider parenting difficulties may (or may not) be associated with this form of abuse;
- Parent/carer has convictions for violent crimes.

Indicators in the family/environment

- Marginalised or isolated by the community;
- History of mental health, alcohol or drug misuse or domestic violence;

- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family;
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Indicators in the child

- Developmental delay;
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment;
- Aggressive behaviour towards others;
- Child scapegoated within the family;
- Frozen watchfulness, particularly in pre-school children;
- Low self-esteem and lack of confidence;
- Withdrawn or seen as a 'loner' - difficulty relating to others;
- Over-reaction to mistakes;
- Fear of new situations;
- Inappropriate emotional responses to painful situations;
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking);
- Self-harm;
- Fear of parents being contacted;
- Extremes of passivity or aggression;
- Drug/solvent abuse;
- Chronic running away;
- Compulsive stealing;

- Low self-esteem;
- Air of detachment – ‘don’t care’ attitude;
- Social isolation – does not join in and has few friends;
- Depression, withdrawal;
- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention;
- Low self-esteem, lack of confidence, fearful, distressed, anxious;
- Poor peer relationships including withdrawn or isolated behaviour.

Indicators in the parent

- Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse;
- Abnormal attachment to child e.g. overly anxious or disinterest in the child;
- Scapegoats one child in the family;
- Imposes inappropriate expectations on the child e.g. prevents the child’s developmental exploration or learning, or normal social interaction through overprotection;
- Wider parenting difficulties may (or may not) be associated with this form of abuse.

Indicators of in the family/environment

- Lack of support from family or social network;
- Marginalised or isolated by the community;
- History of mental health, alcohol or drug misuse or domestic violence;
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family;
- Past history of childhood abuse, self-harm, somatising disorder (hypochondria) or false allegations of physical or sexual assault or a culture of physical chastisement.

NEGLECT

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Indicators in the child

Physical presentation

- Failure to thrive or, in older children, short stature;
- Underweight;
- Frequent hunger;
- Dirty, unkempt condition;
- Inadequately clothed, clothing in a poor state of repair;
- Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold;
- Swollen limbs with sores that are slow to heal, usually associated with cold injury;
- Abnormal voracious appetite;
- Dry, sparse hair;
- Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea;
- Unmanaged / untreated health / medical conditions including poor dental health;
- Frequent accidents or injuries.

Development

- General delay, especially speech and language delay;
- Inadequate social skills and poor socialisation.

Emotional/behavioural presentation

- Attachment disorders;
- Absence of normal social responsiveness;
- Indiscriminate behaviour in relationships with adults;
- Emotionally needy;
- Compulsive stealing;
- Constant tiredness;
- Frequently absent or late at school;
- Poor self-esteem;
- Destructive tendencies;
- Thrives away from home environment;
- Aggressive and impulsive behaviour;
- Disturbed peer relationships;
- Self-harming behaviour.

Indicators in the parent

- Dirty, unkempt presentation Inadequately clothed;
- Inadequate social skills and poor socialisation;
- Abnormal attachment to the child.e.g. anxious;

- Low self-esteem and lack of confidence;
- Failure to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene;
- Failure to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy;
- Child left with adults who are intoxicated or violent;
- Child abandoned or left alone for excessive periods;
- Wider parenting difficulties may (or may not) be associated with this form of abuse.

Indicators in the family/environment

- History of neglect in the family;
- Family marginalised or isolated by the community;
- Family has history of mental health, alcohol or drug misuse or domestic violence;
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family;
- Family has a past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement;
- Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals;
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating;
- Lack of opportunities for child to play and learn.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Indicators in the child

Physical presentation

- Urinary infections, bleeding or soreness in the genital or anal areas;
- Recurrent pain on passing urine or faeces;
- Blood on underclothes;
- Sexually transmitted infections;
- Vaginal soreness or bleeding;
- Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father;
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing;
- Emotional/behavioural presentation.

Makes a disclosure

- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit;
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn;
- Self-harm - eating disorders, self-mutilation and suicide attempts;
- Poor self-image, self-harm, self-hatred;
- Reluctant to undress for PE (which is not associated with developmental, cultural or religious reasons);
- Running away from home;
- Poor attention / concentration (world of their own);
- Sudden changes in school work habits, become truant Withdrawal, isolation or excessive worrying;
- Inappropriate sexualised conduct;
- Sexually exploited or indiscriminate choice of sexual partners;
- Wetting or other regressive behaviours e.g. thumb sucking;
- Draws sexually explicit pictures;
- Depression.

Indicators in the parents

- Comments made by the parent/carer about the child;
- Lack of sexual boundaries;
- Wider parenting difficulties or vulnerabilities may (or may not) be associated with this form of abuse is a sex offender;
- Grooming behaviour;
- Parent is a sex offender;
- Indicators in the family/environment;
- Marginalised or isolated by the community;

- History of mental health, alcohol or drug misuse or domestic violence;
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family;
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement;
- Family member is a sex offender.

Appendix D

GRANGE SCHOOL CHILD PROTECTION RECORD OF CONCERN FORM

The welfare of the child is paramount

Wherever possible, this form should be completed by the adult who had first contact with the child or young person. This report should also be completed as soon as possible after a concern-issue becomes known.

Child's Name:	Class:
Date:	Time:
Incident or Concern (What happened?) Type of Allegation – Verbal, Visual, Physical, Other.	
Who was present?	

Contacts:**REFERRAL DIRECTORY**

	AGENCIES	ADDRESS	PHONE NUMBER	EMAIL	NATURE OF CARE
1	Nigerian Police Gender Desk Office	Lagos State Police Command GRA Ikeja	0801775590	compollagos@yahoo.com	Child Abuse & Domestic Violence
2	Ministry of Youth and Social Development	Block 18, Lagos State Secretariat, Alausa, Ikeja	081830550639	youthandsocialdevelopment.lagosstate.gov.ng	Child Protect, Counselling and Shelter
3	Lagos State Ministry of Education	Block 3, Lagos State Secretariat, Alausa, Ikeja	08087590064	education.lagosstate.gov.ng	Child Protection
4	Lagos State Ministry of Health	Block 4, Ministry of Health, Lagos State Secretariat, Alausa, Ikeja	08033578492	health.lagosstate.gov.ng	Child Right to Health
5	National Agency for the Prohibition of Traffic in Person	165B Oba Ladejobi Street, Off Oba Akinjobi Street, GRA Ikeja	07080601801	infolagos@naptip.gov.ng	Trafficked Children and Rehabilitation
6	One Stop Child Justice Centre, Directoriate of Citizens Rights	Block 2, Ministry of Justice, Secretariat, Alausa, Ikeja	09085180570	info@lagosministryofjustice.com	Legal Representation of Children
7	Lagos State Domestic and Sexual Violence Response Team	Block 2, Ministry of Justice, Secretariat, Alausa, Ikeja	08013-796- 0048	info@dsvrtlagos.org	Sexual and Gender Based Violence



**ACKNOWLEDGEMENT OF RECEIPT OF THE
GRANGE SCHOOL**

**CHILD PROTECTION POLICY
2020 - 2021**

I have received a copy of the current Grange School Child Protection Policy and Procedural document, and have read, understood its contents and will abide by it at all times.

I am aware that the updated document can be found on the Grange School Staff Shared Drive in the folder titled - "Grange Policy Folder".

Staff Member's Name (Please Print)

Staff Member's Signature

Date:

Nb. Upon receipt, this document is to be filed in each staff member's personal file.