



# CHILD PROTECTION POLICY & PROCEDURES

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2023 -2024

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# Introduction

At Peha International School (PIS) we believe that all children and young people have the right to be protected, to experience an environment where they are kept safe from harm, and where their wellbeing is valued and actively safeguarded. We recognise that our responsibilities towards children involve far more than just academics, and also involve being active participants in ensuring the health, well-being and safety of each child within our care.

This policy and the procedures herein apply to all employees, volunteers and Board members of PIS, regardless of their position, role, job description or nationality. This policy also applies when the school is offering education online.

Every international school has the responsibility to have and to implement a Child Protection Policy. This policy aims to protect learners in school and beyond by endorsing a safe haven for children and preparing all staff for child protection disclosures or concerns. This policy is aligned with international and local laws. It provides a consistent set of guidelines and procedures surrounding the area of Child Protection that are appropriate and practical for use in the context of Rwanda. To help us focus on prevention this policy includes:

- The role of the school and staff in protecting children and supporting families
- Our child protection management structure
- Professional development for staff in recognising and responding to suspected or alleged abuse occurring outside of school
- A common definition of child abuse (physical, neglect, sexual and emotional)
- Disclosures, reporting and reaction protocols
- Procedures to ensure the safe recruitment and selection of staff
- Guidance for safe communications involving children
- Appropriate teaching strategies that support learners to recognize inappropriate behaviours, respond assertively and to report incidents to school personnel and/or family members
- A Code of Conduct for Adults to give clear expectations and boundaries regarding the behaviour of staff
- Ramifications of misconduct and procedures for dealing with alleged staff offenders

## Definitions

- Child refers to any person under the age of 18 years old, regardless of whether they are enrolled at PIS or not, as defined by the United Nations Convention on the Rights of the Child, which has been ratified by Rwanda. A learner who turns 19 while enrolled at PIS will also be treated as a “child”.
- Child Protection Lead (CPL) refers to the staff members who are nominated to lead child protection at PIS.

## Role of the School and Staff in Protecting Children and Supporting Families

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. Peha International School endorses the UN Convention on the Rights of the Child, and the African Charter on the Rights and Welfare of the Child, both of which our host country Rwanda is a signatory. This means that learners feel safe, are treated with respect and dignity, taught to treat each other with respect, and are listened to.

### African Charter on the Rights and Welfare of the Child

- Article 4: If children can voice their opinions, then those opinions should be heard and taken into consideration during legal and administrative proceedings.
- Article 7: Every child who is capable of communicating his or her own views should be allowed to express his or her opinions freely.
- Article 16: Children should be protected from all forms of torture, inhuman or degrading treatment and especially physical or mental injury or abuse, neglect or maltreatment including sexual abuse.

PIS fills a special institutional role in society as a protector of children. We need to ensure that all children in our care are afforded a safe and secure environment in which to grow and develop, both at school and away. PIS staff, 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, we all 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.

All staff employed at Peha International School 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 this policy. Furthermore, cases of suspected child abuse or neglect may be reported to the appropriate employer, to the respective consulate in Rwanda, to the appropriate child protection agency in the home country, and/or to local authorities.

Peha International School seeks to be a safe haven for learners who may be experiencing abuse or neglect in any aspect of their lives. As such Peha International School will:

- Publish this policy on our website annually to parents
- Communicate this policy annually to learners
- Provide training for all staff on induction and refresher training annually
- Make every effort to implement hiring practices to insure the safety of children
- Review the policy annually for compliance and effectiveness

In the case of a staff member reported as an alleged offender, Peha International School will conduct a full investigation following a carefully designed course of due process, keeping the safety

of the child as the highest priority.

PIS has a collection of policies and procedures that aim to prevent incidents of child abuse from occurring; along with clear procedures in place for reporting and responding to suspected, observed or disclosed incidents of child abuse.

To help us FOCUS ON PREVENTION this policy is linked to all our policies that address issues of power and potential harm, for example:

- Positive Behaviour Policy
- Whistle Blowing Policy
- Anti-bullying Policy that includes learner on learner violence
- Confidentiality Policy and sharing information

For detailed information on the Convention on the Rights of Child and The African Charter on the Rights and Welfare of the Child see the following links:

[http://www.unicef.org/crc/index\\_30160.html](http://www.unicef.org/crc/index_30160.html)

[https://www.unicef.org/esaro/African\\_Charter\\_articles\\_in\\_full.pdf](https://www.unicef.org/esaro/African_Charter_articles_in_full.pdf)

## **Child Protection Team: Roles and Responsibilities**

PIS has appointed a Child Protection Team (CPT) to support implementation and intervention.

The CPT will consist of:

- The Child Protection Lead
- The Principal from each division
- The Child Protection Lead from each division
- A member of the Human Resources Department
- School Counsellor
- A designated nurse

**Child Protection Lead - Daniel Hollinger**

**Child Protection Lead for High School - Gloria Achola**

**Child Protection Lead for Middle School - Beatrice Musiimenta**

**Child Protection Lead for Primary School - Agnes Nabisere**

## Child Protection Lead for Nursery School - Valentine Kamanyana

The role of a school-based CPT is to ensure that comprehensive child protection policies and procedures are in place and to annually monitor their effectiveness. Specific tasks include:

- Ensure a comprehensive Child Protection Policy is in place
- Work within the school's existing structures to ensure development and adoption of child protection teaching activities that will meet the needs of the school
- Support teachers and counsellors in implementing Child Protection Policy
- Ensure professional development is provided for all staff, including teachers and volunteers
- Ensure parents are supported to understand the objectives and goals of the Child Protection Policy, procedures and teaching activities
- Ensure systems are in place and monitored to educate and involve all school volunteers in the child protection program
- Serve as a resource group in working with child protection cases, e.g. assist reporting and follow-up disclosures, involving multidisciplinary teams where appropriate
- The CPT should meet at least twice annually and plan for the school year, including preparation for the successful teaching of personal safety learning opportunities
- Ensure that a Learner Wellbeing Meeting happens every half term by program and every term for the whole of PIS

## Safe Recruitment

The first and most effective means of preventing child abuse by adults in school is screening out potential abusers before they arrive. All personnel, staff, teachers, volunteers and other members of the community whose potential employment or volunteer service involves direct contact with, and/or the potential for unmonitored access to children (including any individuals who regularly provide transportation to children) will be given thorough reference and background checks, including review of criminal (and sexual offender records if available).

All contractors, vendors and service providers will be requested to provide evidence that a background check was completed on any individual sent by the contractor to provide onsite services. If this is not possible, individuals will be supervised whilst on site.

When PIS enters into a contractual relationship with an external organization where that external organization will be bringing minor children onto its property (e.g. swimming classes), such organizations should be required to provide evidence beforehand that the adults accompanying the minors have undergone the appropriate background and criminal record checks.

The Human Resources Manager is responsible for initiating and evaluating the applicants for positions that require background checks. The elements of a comprehensive background check are detailed in Appendix 1.



# Staff Preparedness

Safe recruitment processes are essential because research shows that victims of child abuse are usually familiar with their abuser. However, many child abuse cases involve a family member. So all staff must be prepared for disclosures and allegations about abuse that might be happening outside of school.

## Definition of Abuse

There are four main categories of abuse - physical abuse, mental/emotional abuse, sexual abuse and neglect. We use the definitions below for each category.

**Neglect** – the persistent or significant neglect of a child, or the failure to protect a child from exposure to any kind of danger, including cold or starvation or persistent failure to carry out important aspects of care, resulting in significant impairment of the child’s health or development, including non-organic failure to thrive due to non-medical reasons.

**Physical Abuse** – physical injury to a child, whether deliberately inflicted, knowingly not prevented, or done to self upon instruction by the responsible adult, including hitting, biting, pinching, kicking, punching, shaking, poisoning and other forms of physical harm. Often physical abuse is on the soft parts of bodies (buttocks, backs, arms) as opposed to the bony parts (chins, knees, elbows).

**Sexual Abuse** – the sexual exploitation of a child or young person for an adult’s or another young person’s own sexual gratification, regardless of whether they have given consent or understand what is happening. This includes but is not limited to watching or forcing a child to participate in making pornography, encouraging or enticing a child to act in a sexual manner, touching a child’s genitals with the intent to gain sexual gratification or the involvement of children or young people in sexual activities of any kind that violate normal family roles.

**Emotional Abuse** – the persistent emotional ill-treatment of a child so as to cause severe and persistent adverse effects on the child’s emotional, physical and/or behavioural development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only so far as they meet the needs of another person, or causing children frequently to feel frightened. It also may include age or developmentally inappropriate expectations being imposed on the child. All abuse has an emotional impact.

## Peer-on-Peer Abuse

It is important that we recognise that children are capable of abusing their peers and that this abuse can include physical abuse, online abuse, sexual violence and emotional harassment. The school’s values, ethos and behaviour policies provide the platform for staff and learners to clearly recognise that abuse is abuse and it should never be tolerated or diminished in significance. It should be recognised that there is a gendered nature to peer-on-peer abuse, i.e. that it is more likely that girls will be victims and boys perpetrators.



PIS will not tolerate instances of peer-on-peer abuse, at school or online, and will not pass it off as “just having a laugh” or “part of growing up”. PIS recognises the impact of sexual violence and the fact that children can, and sometimes do, abuse their peers in this way.

We will follow both international and national guidance and policies to support any children subject to peer-on-peer abuse. Our CPL will follow local guidance to enable the provision of effective support to any child affected by this type of abuse.

## Preparation for Disclosures

Teaching learners about child protection and making oneself a part of their support system invites them to come to staff members with a problem. School personnel must understand and know how to respond appropriately, knowing that it is often very difficult for children to disclose abuse. Learners often cannot tell us about a problem because of the fear of:

- **Memory:** Children often cope with their abuse by pushing it so far back in their minds that they “forget”. To remember means to feel hurt again.
- **Loss of Love:** Children often worry that their parents or friends will not love them once they know about their abuse because now they are “dirty”. This is often because children will take responsibility for their abuse. Children also often fear the separation of their family because of the telling. Offenders work hard to reinforce these feelings in order to keep the child silent.
- **Shame and Guilt:** Children either know or can sense that what happened, especially a sexual experience with an adult, is wrong. By telling someone and acknowledging that this happened, they fear the shame of the abuse. They fear they will get into trouble for telling. Older children will experience more of a sense of guilt than younger children, especially in sexual abuse.
- **Blame:** Children fear that they will be blamed for what happened and in the case of sexual abuse that they somehow wanted it. Adults tend to be believed over the child and offenders often state that the child “asked” for the sexual touch or other abuse.
- **Harm:** Offenders often maintain control over their victims by threatening harm to them or their families if they tell. Children are then burdened with the inappropriate responsibility for keeping their families safe.

Understanding these fears of disclosure helps responsible adults respond appropriately.

## Guidelines for Responding to a Child’s Disclosure

**When a child tells me about the abuse they have suffered, what should I remember?**

- Remain calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never tell a child that you can keep a secret. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.

- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask ‘leading questions’, ‘yes or no’ questions or push for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterward, make a detailed record of the conversation using the child’s own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible.

**Please note:** It is not PIS staff’s role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and make time to talk. Members of staff are not investigators. Staff members’ role is to listen and report disclosures in order for trained staff to determine the next step for children to get the help they need.

**After any disclosure:**

- Share the information with a CPL or Principal.
- Write up the conversation immediately so you do not forget the details using a Child

**Protection Concern Form. When writing up any disclosure:**

- Do not use judgmental language, record only facts, e.g., Not “the child was sad”. instead, “The child was crying but could still talk”.
- Record any questions asked to the child and the child’s exact responses to the questions.

Please do not worry about how to record the disclosure. It is most important that you share the information with the CPL or Principal who will help you write a report.

# Procedures for Sharing Information and Taking Action

All faculty and staff members are mandated to report incidences of physical or psychological violence, aggression, harassment, physical or sexual abuse, and neglect immediately or within 24 hours to a CPL who, in turn, shall inform the Principal and the Head of School.

All PIS employees are also required to report suspicion of abuse or neglect.

## Sharing Information: initial concerns

To prevent possible abuse at school or online all employees should report any concerns even if you think that they seem minor, lack evidence or require monitoring. It is much safer to share all concerns rather than wait for concerns to turn into abuse.

At this level, reports will be maintained to help monitor the situation in the following way:

- Each program's CPL will maintain a file of Child Protection concerns.
- A concern report will be completed and signed by the employee and the CPL.
- The CPL will also record each concern or incident in a notebook in numerical order.
- These will be kept securely and monitored at the Learner Well-being meeting every half term.
- During the meeting the group will check that follow-up support has been given, give reminders about any outstanding actions and discuss if siblings in other programs have raised similar concerns.

## Reporting by Learners

Children/learners are encouraged to report incidents for which they themselves or others may be the victims. Reporting by learners may be verbal or in writing and shared with any school employee, who, in turn shall communicate this information to a CPL or school counsellor. The CPL or counsellor shall gather information and provide written documentation including the date, person or persons involved, and any additional relevant information. If the learner shares information with the counsellor and there is reasonable cause to believe child abuse has occurred, the counsellor will report to the CPL who shall follow the steps noted in these guidelines, documenting all aspects of the investigation and resulting actions.

## Actions and Procedures

Where there is cause to suspect child abuse or neglect, it is the responsibility of the staff member to report their suspicions to their program CPL or the Principal. In all cases, the relevant Principal will be notified. It is the responsibility of the Principal of the program to inform the Designated Child Protection Lead (and/or the Head of School) of the suspected case of child abuse or neglect.

The Designated CPL will support the program CPL to respond appropriately to every concern, disclosure or report. This will include, but will not be limited to, one or more of the following:

- Discussion with children/learners involved
- Notifying the Principal, Designated CP Lead and Head of School
- Parent notification
- Meeting with parents
- Referral to the Child Protection Committee/Team - meeting with others pertinent to the case, including the alleged perpetrator(s)
- Contacting school nurse
- Psychological assessment
- Mandatory counseling sessions
- Legal action and prosecution by the authorities

## Involving Parents/Guardians

In general, we will discuss any Child Protection concerns with parents/carers before approaching other agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the CPL.

However, there may be occasions when the school will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

## Allegations Against PIS Employees

PIS employees are encouraged to be open and realistic in discussing the possibility of abuse within the organisation. Should an employee hear an allegation of abuse, become suspicious of another employee, or see behaviour towards learners that could be considered abusive **it is their responsibility to report it.**

All allegations of abuse will be taken seriously. PIS will not dismiss an allegation of abuse without investigation, regardless of who the allegation is against or who has made the allegation. When a child or member of staff shares a concern about a member of staff, member of the Board or volunteer, the Head of School shall be informed and instigate the course of action required. *See Appendix 4.*

We take the protection of the children within our care very seriously. Failure to comply with the expectation to share information about inappropriate behaviour or concerns about another member of staff will result in disciplinary measures being taken, including dismissal. For example, a member of staff will be dismissed if they do not share information that could have prevented or stopped any form of child abuse or if they tell lies to protect another member of staff, including during an investigation.

## Faculty and Staff Protection: Code Of Conduct for Adults

As a measure to protect both children and staff, PIS has a Code of Conduct for Adults which clarifies expectations. The Code of Conduct applies to all PIS employees so must be agreed to and signed by all school personnel and all volunteers who are part of the school community.

We aim to provide safe environments for all learners at PIS so we are all responsible for maintaining physical, emotional and sexual boundaries in our interactions with all children and learners.

### Protecting Staff from False Allegations

PIS learners will be informed about the Child Protection Policy. They will also be taught about the damage that false allegations can cause along with the consequences. However, this should be done in a sensitive manner so that we do not discourage children from sharing any concerns.

Following our Code of Conduct for Adults will protect staff members from false allegations. The Code of Conduct includes the following expectations for everyone at PIS:

- Be respectful of all learners and establish a sense of fairness and trust in your classroom.
- Inform your Principal when you have concerns about a learner's behaviour.
- Avoid situations in which you are alone with a child (especially where the child is of the opposite gender). When it is necessary to speak privately with a child, find a space that is in sight of others.
- The privacy of children in situations such as toileting, showering and changing clothes should be respected.
- Avoid touching areas that are normally covered by swimming suits; breasts, buttocks and groin.
- Sexual jokes, comments of a sexual nature, kissing, massages or sexual gestures are not appropriate behaviour for an adult staff member or volunteer.
- Do not use corporal (physical) punishment in any form.
- Communicate with children safely and transparently.
- Do not accept gifts from, or give gifts to, children without the knowledge of their parents or guardians.
- Intervene when there is evidence of, or there is reasonable cause to suspect, that children are being abused in any way (including by family or community members, or peers).
- Report suspected abuse or neglect to the appropriate Child Protection Leads as described in the Child Protection Policy.
- Share information about any inappropriate behavior or actions by colleagues.



## Specific Behavioural Protocols

The following protocols will also protect staff from allegations.

### Tutoring

At no time should a staff member be alone with a child who is not their own child, in a place that is not readily seen by other responsible adults, including online. Staff members who are tutoring or teaching children in a group of three or less in a classroom should ensure they leave the classroom door open. Staff members tutoring learners in a one-on-one setting should tutor in an open area.

### Diaper Changing

Nursery children may require diaper changing. Changing should always be done on a changing table or mat in front of another staff member. The changing table should be cleaned after each diaper change. At no time may a staff walk away from a child on the changing table. Volunteers may not be responsible for changing diapers.

### Toileting

Any staff member assisting any child under the age of five years old with toileting duties should leave the bathroom door open while assisting the child. If a child over the age of five years requires toileting assistance and insists on having the door closed for privacy, the staff member must inform another teacher of the need for assistance and of the child's request to have the door closed before assisting the child. A female teacher should always be responsible for assisting a female learner. Male teachers/assistants should not provide toileting assistance to female learners, if at all possible. If a child expresses a preference for a teacher or a desire not to go with a certain teacher, their wishes should always be listened to and accommodated as much as possible. Volunteers may not be responsible for assisting children with toileting procedures.

### Staff Toilets

Staff must use the designated staff bathrooms. If there is a problem with a staff bathroom the school will find a suitable alternative until the problem is rectified.

### Changing Learner's Clothing

When children in Nursery require assistance changing before or after swimming, this shall be done in a classroom with two adults of the same gender present. Learners in N3 or older who can change themselves should be allowed to change in the bathroom, separated into genders, with an adult waiting outside.



## Field Trips

When volunteering to supervise overnight activities, adults should not share sleeping quarters with children other than their own.

## Physical Restraint of Learner

PIS recognizes that occasionally for the safety of a child, staff member or other children, it becomes necessary to use 'reasonable force'. This can be necessary to prevent a child from running out of the classroom in pursuit of their parent, running out the gate, hitting another child or throwing toys, or to prevent a child from harming themselves in anger or frustration.

The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury.

**'Reasonable'** in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Staff members should only use 'reasonable force' in a visible place. Should it be necessary to confine a child in a room, due to behaving aggressively or displaying extreme anger, the door should be open or two staff members should stay in the room with the child, until the child is calm.

To reduce the occurrence of challenging behaviour and the need to use reasonable force teachers will work with their Principal to:

1. Plan positive and proactive behaviour support
2. Write individual behaviour plans for learners when necessary and agree them with parents and carers
3. Consider the risks of restraint and reasonable force carefully, particularly when incidents involve children with SEN, disabilities or medical conditions

## Safe Touch

No employee shall touch a child in an inappropriate, suggestive or sexual manner. As a guideline, teachers should use a swimsuit to illustrate safe touch areas – a pair of swim trunks for boys, and a bathing suit for girls. Teachers should encourage learners from N3 onwards to sit or stand by themselves and should refrain from having them on their lap except when a learner is very upset and requires comforting. This should be done with a child sitting sideways on a teacher's lap. No child should sit on a teacher's lap in Grade 1 and above for any reason. Teachers must never force touch on a child, and should always be guided by a child's response when they initiate touch. Bearing in mind the young age of learners who often require touch for comfort or other reasons, teachers should be guided by the rule that only touch that they would feel comfortable doing in front of the school director or the child's parent is appropriate.

## Pornographic Material

No employee shall view any pornographic material while on school grounds or when responsible for the supervision of learners off school grounds. No staff member shall view pornographic material AT ANY TIME (on or off school grounds) that involves participants who appear to be children, or are being portrayed as being children, or are under the age of

18. These are actually considered child abuse images, not pornography.

## Age of Consent in Rwanda

The age of consent in Rwanda is 18 years. No employee shall knowingly engage in sexual activities with a person under the age of 18. This includes paying for sexual services or entering into an ongoing relationship with sexual expectations. Employees at PIS are in a position of power, and therefore must not engage in any form of emotional, physical or sexual relationship with any learner enrolled at PIS, even when they reach or exceed the age of consent.

## Communication with Children

Communication with children must be conducted safely, transparently and without a harsh tone, both in school and online. The following steps will reduce the risk of private or otherwise inappropriate communication between PIS parents, administration, teachers, personnel, volunteers and minors:

- Communication between PIS staff (including volunteers) and minors that is outside the role of the professional or volunteer relationship (teacher, coach, host, etc.) is prohibited.
- Email exchanges between a learner and a person acting on behalf of the school are to be made using electronic communication that takes place over a school network or platform that is subject to periodic monitoring.
- Faculty, staff and volunteers who use any form of online communication, including, email, social media (Facebook, WhatsApp, Twitter, etc.) and messaging to communicate with learners may only do so for activities involving school business using the school systems, e.g. ManageBac Google Classroom.

## Discipline

No employee shall discipline a child in a physical manner, including but not limited to beating, pinching, ear twisting, pulling hair, hitting or pulling, harsh physical restraints, or slapping. If a parent asks or gives permission to a teacher or assistant to physically discipline a child the teacher should inform the parent that we do not physically discipline a child and should inform the Child Protection Lead for your program. This should be noted in the child's file. No teacher shall discipline a child in a manner that is harsh, belittling, shaming or elicits an extreme emotional response from a child.

## Witnessing Inappropriate Behaviour

Should an employee witness another employee physically disciplining a learner they are expected to immediately inform the Designated Child Protection Lead, Principal or Head of School. Failure to do so will be treated as a breach of policy and the employee will be disciplined accordingly. Likewise, if an employee witnesses a parent, caretaker or any other non-staff member abusing a child in any manner they must report it to the Designated Child Protection Lead, Principal or Head of School.

## Education and Training

PIS has many stakeholders on campus, including Board Members, administrators, faculty, after-school instructors, guards, cleaners, drivers and kitchen staff

- All employees or members of the PIS community will be made aware of the Child Protection Policy.
- Peha International School will provide a French and Kinyarwanda language version of this policy.
- Peha International School will implement training for all new staff on child protection and the Child Protection Policy.
- PIS will conduct a child protection refresher training annually for returning staff.
- Staff performance reviews will include an opportunity for staff to appraise their own child protection behaviours and discuss any issues or concerns they may be encountering.
- PIS will provide lessons to all learners on safe touching, at least annually.
- Counsellors and Nurses should receive training that is related to their specialism, annually.
- Each academic year the Child Protection Policy will be reviewed and updated as necessary.

## Teaching Learners

Keeping safe and healthy, including child protection issues, will be addressed through all areas of the curriculum. This means that at PIS we will provide opportunities for learners to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.

## Jigsaw PSHE/Health and Wellbeing Program

Designed as a whole-school approach, the Jigsaw PSHE/Health and Wellbeing program provides a detailed and comprehensive scheme of learning for ages 3-16. Jigsaw aims to prepare children and young people for life, helping them really know and value who they are and understand how they relate to other people including their peers.

## Sex Abuse Prevention Education

In its most effective form, abuse prevention education teaches children about “safe” and “unsafe” touches in a safety-based, developmentally sequenced curriculum. In order to provide children with adequate tools to resist the overtures of potential offenders, children must have the following information:

- The accurate names of private body parts
- Rules-based instructions regarding what to do if someone touches them in a way that is harmful, which is to say “No”, get away and tell an adult
- Assurances that they get to say whether a touch is “unwanted” or not
- Assistance in identifying the safe adults in their lives
- Reminders that they can always talk to parents or another trusted adult about anything
- That they should continue to tell about harmful, unwanted, unsafe or bad touches until they are believed
- That abuse is never their fault

Sex abuse prevention education is “preventive” in nature. It is not intended, nor does it claim to educate children about sex, sexuality, the sexual functions of private parts or human love relationships. It is intended to teach children about their rights to assert limits over what happens to their bodies and to give them the tools necessary to communicate effectively if someone violates those boundaries. In short, sex abuse prevention education teaches children how to prevent themselves from being victims of criminal behaviour.

## Professional Development

- The Head of School ensures training takes place and adequate resources are available to support the program.
- Professional development can be provided by the CPLs, Principals, counsellors and other administrators who are appropriately trained.
- Skill training specific to job description – to be determined by needs of individual personnel – minimally twice a year.

## Failure to Comply with the Child Protection Policy

We take the protection of the children within our care very seriously. Failure to comply with this policy will result in disciplinary measures, which will vary depending on the breach of policy. Peers and staff members whose actions contravene the procedures and policies within will face progressive disciplinary measures, up to and including dismissal. Actions that are deemed illegal or directly contravene this policy in a serious and severe manner are grounds for instant dismissal.

# Appendix 1: Safe Recruitment Checklist

The Human Resources Manager is responsible for initiating and evaluating the applicants for positions that require background checks. The elements of a comprehensive background check include:

- A written application and a “statement of suitability” requiring a signature stating that the applicant knows of no reason or prior circumstance that would preclude him/her from working safely with minor children.
- A personal interview.
- Reference checks.
- Criminal history background check (local, state, multi-state, national, international options depending on where the applicant is coming from and the position being sought).
- Sex offender registry check in some Western countries.
- Published procedures as to how and by whom criminal history records will be reviewed and evaluated (with criteria for disqualification) – including a description of the appeals process required by law.
- A statement that all background screening accomplished by or on behalf of the organization will comply with relevant privacy laws.
- PIS reserves the right to conduct background screening and will make this explicitly clear to employees and volunteers, at any time after employment or volunteer service has begun – and will do so periodically. It should also be made clear to all applicants that any misrepresentations, falsifications, or material omissions in the information provided by the applicant, whenever discovered, may result in disqualification from, or termination of employment or volunteer service with the organization.
- Unless otherwise provided by law, a criminal record will not automatically disqualify an applicant. In general, if a background check indicates that there is adverse or criminal activity in the applicant’s background, the office responsible for screening (i.e., Human Resources) can bring the adverse or criminal information to a small “Review Committee” comprised of senior staff for final determination and possible appeal (with criteria for disqualification determined by the organization).
- For example, if a check indicates that the applicant has an adult criminal record it must be reviewed by the school and placed into one of the following three categories:
- Permanent Disqualification: permanently disqualified from working with children because of the particular criminal offense
- Presumptive Disqualification: before a determination can be made the school can review additional information and consider:
  - ◇ The relevance of the criminal offense to the nature of the employment or volunteer service being sought;
  - ◇ The nature of the work to be performed;



- ◇ The seriousness and specific circumstances of the offense;
  - ◇ The age of the candidate at the time of the offense;
  - ◇ The number of offenses;
  - ◇ The length of time since the offense occurred;
  - ◇ Whether the applicant has pending charges;
  - ◇ Any relevant evidence of rehabilitation or lack thereof;
  - ◇ Any other relevant information, including information submitted by the candidate or requested by the hiring authority.
- Discretionary Disqualification: infraction is minor enough that hiring decision can be left to the discretion of the school.
  - Extracurricular instructors and volunteers also need to be screened.

## **Recruitment and Screening of Foreign Employees**

All foreign employees, including volunteers and substitute teachers will be carefully and properly screened during their recruitment period, including, but not limited to, obtaining a police check (where possible); signing internal policies (including the Child Protection Policy); and stating that they have had no previous convictions for abuse against children, violent behaviour or improper conduct.

All applicants must provide a minimum of three professional references that will be checked by phone or email before an applicant is offered the position. This check will include either a verbal or written request to the referee of whether they have any concerns as to why the candidate should not be employed to work with children or youth.



## Appendix 2: Code Of Conduct for Adults

We aim to provide safe environments, both online and in person, for all learners at PIS. As adults we are each responsible for maintaining physical, emotional and sexual boundaries in our interactions with all young children and learners. Following our Code of Conduct for Adults will help protect employees from false allegations.

We must show prudent discretion before touching another person, especially children and young learners, and be aware of how physical touch will be perceived or received, and whether it would be an appropriate expression of greeting, care, concern, or celebration. Learners/children should initiate any touch (hugging, requesting help with toileting etc). We must avoid any covert or overt sexual behaviours with those for whom we have responsibility. This includes seductive speech, gestures or gazes, as well as physical contact that exploits, abuses, or harasses.

As a responsible adult working at PIS I agree to:

- Be respectful to all children/learners and establish a sense of fairness and trust in my classes (including Google Classrooms).
- Request support from my Principal when I have concerns about a learner's behaviour.
- Avoid situations in which I am alone with a child (including online); when it is necessary to speak privately with a child, I will find a space that is in sight of others.
- Respect the privacy of children in situations such as toileting, showering and changing clothes. I will ask a colleague to accompany me when I enter children's bathrooms/changing areas (e.g. to support toileting in nursery).
- Avoid touching other people, learners and adults, in areas that are normally covered by swimming suits; breasts, buttocks, and groin (when it is necessary to change children in the nursery I will ensure a colleague can see what I am doing).
- Not use physical punishment in any form (including giving a physical punishment such as cleaning as a response to behaviour not associated with cleaning).
- Communicate with children safely, transparently and always without a harsh tone.
- Not accept gifts from, or give gifts to children without the knowledge of their parents or guardians.
- Share information with the Child Protection Lead or Principal when there is reasonable cause to suspect that children are being abused in any way, as described in the Child

### Protection Policy.

- Share information with my Principal, Child Protection Lead or Head of School about any worrying or inappropriate behavior or actions by my colleagues.

I have read, understand and agree to adhere to the Child Protection Policy and Procedures, and Code of Conduct for Adults.

**Name (print):**

**Positon:**

**Signature:**

**Date:**

# Appendix 3: Guidance for Assembling Members of the Child Protection Team

The school-based Child Protection Team will delegate representatives and meet based on need. This includes when a teacher brings a concern to the team or when a child discloses (Category C). The team will look at school policy and the nature of the abuse in order to determine the next step for action.

The CPC may consist of:

- The adult reporting the concern
- The Child Protection Lead
- The Principal from the relevant program
- The Child Protection Lead from the program or the HR department
- School Psychologist/Counsellor or designated nurse, if applicable
- The Designated Child Protection Lead - Carmel Faulkner, if requested
- The Head of School if required/appropriate

Discussion can be guided by the following information:

- Child’s name, address, birth date, gender, and grade
- Parent’s name, address, home phone (if possible) and workplaces
- Nature and extent of the suspected abuse
- Information on previous injuries or background data
- Identity of alleged abuser (if known) – or self-harm
- The gathered information will classify the case as Category A, B, or C

Category A: Most cases will be handled by school counsellors or nursery teachers supported by the CPL.	Category B: Some cases may be referred to outside resources:	Category C: Cases reported for investigation
<p><b>learner relationships with peers</b></p> <ul style="list-style-type: none"> <li>• Parenting skills related to disciplining children at home</li> <li>• learner-parent relationships</li> <li>• Mental health issues such as depression, low self-esteem, grieving</li> </ul>	<p>Mental health issues such as depression, psychosis, dissociation, suicide ideation</p>	<p>Severe and ongoing physical, emotional and sexual abuse or neglect</p>

# Appendix 4: Allegations about a Member of Staff, Board Member or Volunteer

1. All allegations of abuse will be taken seriously. PIS will not dismiss an allegation of abuse without investigation, regardless of who the allegation is against or who has made the allegation. Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical:** For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
- **Emotional:** For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual:** For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault and rape.
- **Neglect:** For example failing to act to protect children/young people, failing to seek medical attention or failure to carry out an appropriate risk assessment.
- **Spiritual Abuse:** For example using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

2. If a child or employee makes an allegation about a member of staff, Board Member, visitor or volunteer the Head of School must be informed immediately. The Head of School must carry out an urgent initial check in order to establish whether there is any substance to the allegation. The Head of School should not carry out the investigation himself or interview children/learners.

3. The Head of School will exercise and be accountable for their professional judgment on the action to be taken as follows:

- If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Head of School will notify the Designated Child Protection Lead. The Head of School will liaise with the Chairman of the Board to advise about action to be taken.
- If the allegation requires further investigation the Designated Child Protection Lead or a trained Child Protection Lead will initiate the process.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil. These should be addressed through the school's own internal procedures.
- If the Head of School decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child's personal file. The allegation should be removed from staff personnel records. If the allegation appears false or malicious, the Positive Behaviour Policy should be followed to address this in the case of children.

4. Where an allegation has been made against the Head of School, then the Chair of the Board takes on the role of liaising with the Designated Child Protection Lead. If the allegation is made against the Designated Child Protection Lead or a Principal then the Head of School will lead and nominate an alternative Child Protection Lead to support the investigation.

## Investigation Process

1. Investigations will be led by a CPL, the Designated CPL, or Principal depending on the position of the accused person.
2. The allegation is to be kept confidential. Employees found to be discussing the allegation will have disciplinary action taken against them
3. All investigations will be kept confidential, and any investigations of serious abuse will take place under external advice and counsel.
4. Allegations against a staff member of a violent or sexual nature, or any allegations of serious nature will result in the staff member being temporarily relieved of their duties which involve contact with learners. Staff members will be paid while the investigation is conducted.
5. An investigation report will be presented to a Child Protection Committee of which all members will be suitably trained.
6. The Child Protection Committee will review the report and convene further interviews if deemed necessary and seek external advice as appropriate.
7. The Child Protection Committee will provide a recommendation to the Head of School.
8. The Head of School will hold the final decision regarding the outcome of the investigation.
9. If a foreigner is involved, and an allegation of a serious nature is found likely, the appropriate embassy will be informed.
10. When necessary, PIS may involve outside organisations for advice, support, counsel, or protection of children or staff members.
11. Following the investigation, all records relating to an allegation concerning staff members will be filed confidentially with the Head of School.
12. In situations where any employee is under investigation by an outside agency for crimes of a violent or sexual nature, PIS will take action under advisement from the agency involved or from another outside organisation regarding the appropriate course of action. If at any time PIS feels the employee is unsafe or untrustworthy around learners, they may suspend the employee until the investigation is complete.
13. In cases where PIS feels it is necessary to suspend a teacher while under investigation, the employee is entitled to up to three days paid suspension or as long as the investigation takes place. This is to recognise that while PIS takes these matters seriously, employees are not considered guilty without cause, and that the suspension is given to protect the learners, the employee and School during the investigation.