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POLICY STATEMENT

CHRISLAND SCHOOLS LIMITED is registered with the Corporate Affairs Commission (CAC) to provide educational services, including running day and boarding schools in Nigeria and therefore runs 14 (fourteen schools) including nursery, primary, secondary and post-secondary schools (herein referred to as 'schools'). The Institution protects and stands for **THE BEST INTEREST OF THE PRECIOUS CHILDREN** under her care and in general, and stands against all forms of abuse and the exploitation of children, including but not limited to physical; sexual; emotional; spiritual and neglect.

The Institution has developed a robust **SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN** (SAFEGUARDING AND CHILD PROTECTION) SYSTEM, codified into an IMPLEMENTATION POLICY and accompanied by WORKING PROCESSES to minimize the risk of abuse to the precious children who attend all her schools, and are under the authorised custody of her caregivers (teachers, non-academic, support staff, volunteers and all other personnel, who interface/come into contact with their precious children daily or occasionally) within and outside the premises of the schools.

By the operations of this **SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN (**SAFEGUARDING AND CHILD PROTECTION) SYSTEM, IMPLEMENTATION POLICY, and WORKING PROCESSES, the Institution makes a firm and uncompromising commitment to ensure she takes every possible and foreseeable

measure to prevent abuse and exploitation, actions or omissions that can be misinterpreted by children, their families or other adults as constituting or leading to abuse of the precious children under her care within and outside her institution when they are under her lawful custody.

By the operations of this **SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN (**SAFEGUARDING AND CHILD PROTECTION) SYSTEM, IMPLEMENTATION POLICY, and WORKING PROCESSES, the institution makes a commitment that where concerns are raised or situations of suspected harm or abuse are identified, appropriate action is taken to ensure the child is assisted to prevent similar situations from occurring again.

The Institution's **SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN (**SAFEGUARDING AND CHILD PROTECTION) SYSTEM, IMPLEMENTATION POLICY and WORKING PROCESSES are based on the principles of the following local and international laws:

- I. United Nation's Convention on the Rights of the Child (UNCRC)
- II. African Charter on the Rights and Welfare of the Children
- III. The 1999 Constitution of the Federal Republic of Nigeria
- IV. Child Rights Act, 2003
- V. Child Rights Laws of the States in which the schools exist
- VI. Trafficking Persons Prohibition Law Enforcement and Administration Act (NAPTIP Act)
- VII. Other relevant state laws and regulations referred to in this policy or are in the operation to protect children from all forms of abuse and exploitation.

All other policies and administrative processes of the Institution adhere strictly to the **SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN** (SAFEGUARDING AND CHILD PROTECTION) SYSTEM, IMPLEMENTATION POLICY, and WORKING PROCESSES as the standards of always promoting **THE BEST INTEREST OF THE CHILD** in all things.

Therefore, **SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN (**SAFEGUARDING AND CHILD PROTECTION) SYSTEM, IMPLEMENTATION POLICY, WORKING PROCESSES are in strict alignment with the following core compliance documents and policies of the Institution:

- I. Handbook for Learners
- II. Health and Safety Policy
- III. Code of Good Conduct (Educators)
- IV. Code of Good Conduct (Learners)
- V. Pastoral Care Policy

VI. Boarding Staff Handbook

Chapter 1

CODE OF CONDUCT

Safeguarding and Protection of the precious children under our care begins with our conducts as secondary caregivers and failure to achieve the same is foundationally attributable to our misconducts.

For conducts to be sacrosanct, they must be codified and spelt out as the foundational principles of a **SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN** (SAFEGUARDING AND CHILD PROTECTION) SYSTEM, IMPLEMENTATION POLICY, WORKING PROCESSES.

Codified and spelt out conducts also help us to understand that Safeguarding and Protection of the precious children under our care, though guaranteed by a System, Policy and Processes, is operationally dependent on the conducts of individuals, who interface and provide care for the precious children under our care.

Therefore, set out below is the professional Code of Conduct to which secondary caregivers must adhere to strictly in the commitment to achieve Safeguarding and Protection of the precious children under our care. They must not only learn it by heart, but seek to be established in the practice of the same.

Employees and others (volunteers, visitors and interns) who come in contact with children should ALWAYS:

- A. Understand that all staff are responsible for ensuring that 'Every Child Matters' so that our children are healthy; stay safe; enjoy and achieve social well-being; make a positive contribution.
- B. Give consideration to all aspects of children's safety, namely;
 - i. Safety from injury and accident; self-harming
 - ii. Safety from society, the neighbour and community
 - iii. Safety from all forms of abuses and neglect
 - iv. Safety at schools from staff and other children; bullying including cyberbullying, use of mobile phones and cameras.

C. Ensure that THE BEST INTEREST OF THE CHILD is paramount in all decisions concerning all children.

- D. Possess the knowledge (what to do), skill (how to do) and attitude (the fortitude to do) to work with children.
- E. Treat children with respect and dignity irrespective of their age, sex, ethnic, religious background/belief, or disability.
- F. Avoid situations in which children are outside the scope of adult supervision within the schools and when out under the custody of the schools.
- G. Ensure that contact with children takes place in an open and accessible place and apply the 'two-adult rule' (supervision by at least 'two-adult rule' at a time) and where this is impossible, a suitable alternative arrangement should be made.
- H. Identify and avoid compromising/suspicious situations which might lead to accusations of improper behaviour/conduct.
- I. Beware that physically handling a child (for example: hugging, holding or touching) perhaps to offer comfort can make the child feel uncomfortable or can be misconstrued by observers and therefore must embrace professionalism and moderation in offering such care.
- J. Organise awareness discussions with children on their basic rights as stated in existing national and international legal instruments.
- K. Teach children their responsibilities as provided in Sections 19 and 20 of the Child Rights Act, 2003 as follows:
 - i. **Family Cohesion**: working towards the cohesion of their families.
 - ii. **Respect:** respecting their parents and elders.
 - iii. **Service to Society** placing their physical and intellectual capabilities at the service of the State.
 - iv. Moral Consideration: contributing to the moral wellbeing of the society.
 - v. **Peace Building**: strengthening social and national solidarity.
 - vi. **Patriotism:** preserving the independence and integrity of the country.

- vii. **Tolerance:** respecting the ideals of freedom, equality, humaneness, and justice for all persons, relating with others in the spirit of tolerance, dialogue and consultation.
- viii. **Global Commitment**: contributing to the best of their abilities, solidarity, and unity with Africa, and the world at large.
- L. Organise periodic trainings for children on how to stay safe and be part of their own protection, depending on their age and ability to understand and apply the skills taught at such training programmes and how to report concerns on child protection or suspicion of abuse to self or fellow students/pupils.
- M. Protect the integrity and identity of the children they work with.
- N. Ensure that the consent of the child is sought and obtained before obtaining data and should be done in a child friendly environment.
- O. Identify their limits and ensure referrals where necessary, particularly where it is suspected that a child is behaving inappropriately to the caregiver.
- P. Ensure that confidentiality is always maintained, except for the purpose of bringing the matter to the notice of appropriate authorities for treatment.
- Q. Seek and respect the opinion of the child at all times.
- R. Be sensitive to attitudinal changes of pupils and students which may indicate they are at risk of abuse, depression, etc. and may need help or protection.
- S. Respect the norms, culture, tradition and religion of the child at all times.
- T. Ensure that children participate in decisions that concern them.
- U. Follow the mechanism for Response to Concerns/Allegations put in place by the School including the use of Concern/Complaints/Allegation Form (attached as Appendix 2)

Employees and others (volunteers, visitors and interns) who come in contact with children should NEVER:

- A. Give preferential treatment to any child.
- B. Use any form of physical 'punishment' including hitting, physical assault and physical abuse.
- C. Enter into any form of sexual or immoral relations with a child.
- D. Engage in any form of inappropriate or culturally unacceptable physical behaviour such as kissing, fondling, hugging, or suggestively touching a child.

- E. Act in a manner, organise or approve activities which are abusive or place a child at risk of abuse, including exposing children to age-inappropriate musical and related contents in the name of entertainment.
- F. Use improper language, crack suggestive jokes, dress or act in a physically or sexually provocative and inappropriate manner towards children.
- G. Engage in any action or omission, which compromises the sexuality of the child, including exposing children to media contents (music, movies, hard and soft publications etc.) which are not by rating meant for children consumption.
- H. Stay alone with child/children whether in staff accommodation, school premises or elsewhere.
- I. Invite a child or children to their place of residence or stay overnight alone in a room with a child.
- J. Do things for children of personal nature which they can do by themselves, considering their physical and mental development.
- K. Use children or their situations as objects of joke in their interaction with others within and outside the schools.
- L. Be found in a compromising or vulnerable position with a child (the adult will be considered and held responsible even if he claims the child behaves seductively).
- M. Fight or quarrel with another adult in the presence of children.
- N. Delay in acting on cases that are reported to them.
- O. Label a child, for example. stubborn, slow learner, talkative, witch, bed-wetter, dullard, ringleader, prostitute and any other derogatory appellations or nicknames.
- P. Make comments on Child Safeguarding issues to the media/public that could undermine the safety of child/children.
- Q. Give their contacts (email, telephone numbers and physical address) to children.

Chapter 2

DEFINITION OF TERMS

- A. Who is a Child: By virtue of Section 277 of the Child Rights Act, 2003, a 'child' means, a person under the age of eighteen years.' The foregoing provisions mean that the law captures young children, pre-teen and teenagers as children.
- B. **Best Interest of the Child:** According to Part 1 of the Child Rights Act, 2003, 'in every action concerning a child, whether undertaken by an individual, public or private body, institutions or service, court of law, administrative or legislative authority, the best interest of the child shall be the primary consideration.'

The best interest of the child is not served when acts are perpetrated (by commission or omission) deliberately or otherwise that militates against the development of the complete child. Who is a complete child? A child is complete when he/she is prepared for the responsibilities of adulthood.

C. **Child Safeguarding**: Refers to every step deliberately and consistently taken by the family, community, state and international community, based on knowledge, skill, good conscience, promptness, inner strength, and an unalloyed commitment to the present and the future of the child, aimed at protection (through prevention) of the child from all forms of abuse, neglect, exploitation, violence and everything that is contrary to the best interest of the child, whether they appear as abuse or not.

- D. **Child Protection**: The processes undertaken to protect children, who have been identified as suffering one form of abuse or the other or who are at the risk of suffering any form of abuse or significant harm.
- E. **Safeguarding and Child Protection System:** Child protection system involves carefully identifying or recognising every stakeholder, including the children, on child protection, enlightening, empowering and organising them towards creating and strengthening protective environment and providing sustainable service delivery, (which emanates from rich and purposeful interaction with the stakeholder) towards child protection and respect for the rights of children, as provided by legal instruments, policies, customs and traditions, which set the formal and informal frameworks for the child protection, upholding the best interest of the child as the operating system.
- F. **Safeguarding and Child Protection Policy:** This is a statement of will, predicated on the dominant culture and value system of an organisation and it is the codification of the Safeguarding and Child Protection System.
- G. Significant Harm: Treatment or the impairment of health or development
- H. Child Abuse: Child abuse must be defined by its impact. This is the only way to drive the message home at a glance and deter the Duty Bearer from abusing the Rights Holders. Abuse of any kind succesfully at all times and every circumstance DEHUMANIZE the child. What does it mean to dehumanize? 'Make Somebody Less Human: to make somebody less human by taking away his or her individuality, the creative and interesting aspects of his or her personaility, or his or her compassion and sensitivity towards others' (Microsoft® Encarta® 2009).
- I. **Rights Holders:** Children are born with rights and they are only codified into the provisions of the law. These rights are not conferred by human and their established system and therefore they cannot pick and choose, which one to respect or not respect. Therefore it is a wrong use of language when we say, 'give children their rights.' We cannot give children their rights, we can only respect their rights. The rights are already given. Please note that respecting rights, already conferred by the creator is not a gift to children. It is an act of obedience to their Creator. To disrepect their rights is to act against the order created by the creator. Our children are born as Rights Holders, they came to this world, holding the rights in their hands, therefore we must live up to the expectation of the Creator and respect these rights.
- J. **Duty Bearers:** There are two(2) categoties of caregivers in the life of the child, namely primary caregivers (parents and guardians) and secondary caregivers(every person, other than the biological parents or guardian of the child, charged with the responsibility of providing care for the child). These persons are duty bearers. They are duty bearers because they owe it to the child to protect him/her. Considering the fact that the primary caregivers (parents) invited the child to this world without his/her

consent, they are duty bound to protect and care for the child. The secondary caregivers accept responsibility of a duty of care for the children, therefore they are duty bound to protect and care for the child.

- K. **Staff:** All adults working for or on behalf of the Institution, full time or part time, temporary or permanent including supply staff, in either a paid or voluntary capacity including contractors, members of the Board of Directors and management and others, who interact or interface with the pupils/students on the authority of the school.
- L. **Parent:** Birth parents and other adults who are in a parenting role, including adoptive parents, stepparents, grandparents, foster parents, legal guardians, sponsors, provided there is privity of contract between them and the Institution as it relates to registration of their children in any of her schools.
- M. **Concerns/ Complaints:** These are oral or written expression of dissatisfaction or concern about facilities, services or treatment of a child.
- N. **Allegation:** This is an oral or written declaration of wrongdoing or an assertion of misconduct or criminal behaviour, the validity of which has not been established

O. Types of Abuse

- i. **Physical Abuse:** 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 caregiver fabricates the symptoms or deliberately induces illness in a child.
- ii. **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 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 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.
- iii. **Child Sexual Abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether the child is aware of what is happening. The activities may involve physical contact, including penetrative (for example, molestation, buggery/anal sex or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving

children in looking at or in the production of pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

In addition to the foregoing, The Child Rights Act 2003, Violence Against Persons Prohibitions Act(VAPP) and the Criminal Justice System in Nigeria recognise the following categories of Child Sexual Abuse:

- a. Child Defilement
- b. Child Sexual Assault
- c. Child Sexual Harassment

The provisions of the listed laws above are contained in **Child Sexual Abuse** According to the Nigerian Law and named Appendix 3

- iv. **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 secondary caregiver failing to:
 - a. Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
 - b. Protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers),
 - c. Ensure access to appropriate medical care or treatment.
 - d. It may also include neglect of unresponsiveness to a child's basic emotional needs.
- v. **Exploitation**: Commercial or other exploitation of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, or spiritual, moral or social-emotional development.
- vi. **Other Forms of Abuse:** As the society develops and becomes dynamic, the list of categories of child abuses is becoming scarily long. for example before 2008, the long list of abuses of children in Nigeria did not include children being dubbed witches. Also, until recently, kidnapping, killing of children and internet abuse(bullying), were not within the ugly range of abuses children are subjected to.

Since we cannot possibly list all the types of abuse that children are expsosed to both in the hands of primary and secondary caregivers, the litmus test to determine whether an act or omission constitute abuse or not is the best interest of the child. P. **Signs and Symptoms of Child Abuse and Neglect:** It is not enough for us to know the types of abuses children are exposed to. As primary and secondary caregivers, we must know the signs and symptoms of abuse and neglect of children. Until we know the signs and symptoms, our children will experience abuses under our noses, and we will not be able to help them either personally or by referrals.

Please note that the signs and symptoms shared below are not to be sighted and ignored. They are to cause us to act immediately to prevent further damage to the child. To see the signs and symptoms and look another way is to join the abuser to further sabotage the destiny of the child.

Remember that to deny a child of his/her rights is to steal from the child his/her natural and priceless endowment from God.

Please note that the signs and symptoms are shared in the main policy. They are not to be sighted and ignored. They are to cause us to act immediately to prevent further damage to the child.

Chapter 3

SAFE RECRUITMENT AND SELECTION

Safe Recruitment is the next cardinal commitment upon setting out the Code of Conduct of Caregivers and setting out the terms and definition of the policy.

The policy sets out the professional steps to ensure we hire the right people, who have and would exhibit the right conducts, enumerated in Chapter 1 and others in their relationship with our precious children, ensuring we achieve Safeguarding and Child Protection: Background checks proper document are done. Necessary induction and training is also done upon employment

Chapter 4

SPECIAL PROVISIONS

- **1. School Runs**: This is in accordance with the "Guidelines for School Bus Operation" released by the Standard Organisation of Nigeria (SON) elaborated by the Technical Committee for School Bus Standards with reference to national and international regulations/guideline as well as comment from relevant stakeholders across the country
- 2. Prevention of Child-to-Child Abuse: Anti-Bullying Provisions: The policy contains provisions on how to curtail bullying by giving due attention, enlightenment, quick response and involving parents among others. The provisions covers Physical ,Emotional,Verbal, Cyber-bullying, Sexual bullying and Pack bullying.
- **3.** Provision on Children with Disability: The policy contains provisions on 'Persons with disabilities to include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.' The provisions are based largely on the provisions of the Convention on the Rights of Persons with Disabilities, which clearly prohibits discrimination among others
- **4. Provisions on Online Safety:** Information and Communications Technology (ICT) covers a wide range of resources including web-based and mobile learning. Internet use will enhance learning, but it also comes with content, contact and conduct risks and dangers.

At Chrisland Schools Limited, we, therefore, understand the responsibility to educate our pupils on online safety issues; teaching them the Appropriate Value System and steps to take to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom. Detailed provisions are in the policy.

5. Provisions and Protection from Covid-19 Virus: Our policy position and processes in this regard shall be in strict accordance with the COVID-19 Guidance for Schools in Nigeria released by NIGERIA CENTRE FOR DISEASE CONTROL(NCDC) and dated March 5, 2020. Here is the link <u>https://covid19.ncdc.gov.ng/</u> to the COVID-19 Guidance for Schools in Nigeria and we are guided by the same in respect of our preparation and response to the COVID-19 pandemic as an institution of learning.

Chapter 5

PRACTICAL GUIDES TO SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN (SAFEGUARDING AND CHILD PROTECTION) POLICY

The practical guides include:

- A. Appropriate use of mobile phones and cameras
- B. CCTV installation and monitoring
- C. Observing boundaries of comforting a child
- D. Maintaining relationships with children
- E. Involving pupils in their self protection
- F. Use of reasonable force and physical restraint
- G. Preparation of child safe action plan (CSAP)

- H. Taking adequate steps in the case of a missing child
- I. Observing the duty of care and out-of-school activities
- J. Application of the 'two-adult' rule
- K. Involvement of experts
- L. Commitment to child safeguard risk assessment/analysis

Chapter 6

RESPONSE TO CONCERNS/ALLEGATIONS

- A. Child Protection and Safeguarding Focal Personnel: There shall be for each school under the Institution, Designated Safeguarding Officer (DSO) and a Deputy Designated Safeguarding Officer (DDSO) who are assigned by the Designated Safeguarding Coordinator (DSC) with the approval of the Designated Safeguarding Director (DSD).
- **B. Direct Reporting Line**: The Designated Safeguarding Officer (DSO) while the Head of Unit is informed shall report directly to the Designated Safeguarding Coordinator (DSC), who shall report to the Designated Safeguarding Director (DSD) who shall report to the Managing Director of the Institution, who shall report to the Chairman, Board of Directors.

The Duties of the the child protection focal persons, proper response procedure and details on reporting are contained in the policy

Chapter 7

PARENTS/SCHOOL PARTNERSHIP FOR SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN (SAFEGUARDING AND CHILD PROTECTION) SYSTEM

Parents are involved in the process of Securing A Friendly and Protective Environment® For Children by giving information about existing Child Protection System and their roles at different points and through different media as stipulated in the policy.

It should be noted that abuse perpetrated by Primary Caregivers will also be appropriately dealt with according to the law with the DSO heading the process.

Chapter 8

MISCELLANEOUS PROVISIONS

Under this head, there are provisions to ensure the following:

- A. Pupils/Students Feedback Mechanism
- B. Analysis and Investigation of Reports
- C. Proper Treatment of Substantiated Allegations Perpetrated by Secondary Caregivers
- D. Proper Treatment of Substantiated Allegations Perpetrated by Primary Caregivers
- E. Training for Child Focal Persons and other staff.
- F. Annual review of the policy for Amendments
- G. Qualitative and Quantitative measures of Monitoring And Evaluation of This Policy
- H. Adequate Record Keeping and Data Protection

Appendix 1

CHRISLAND SCHOOLS LIMITED

SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN AND SAFEGUARDING COMMITMENT FORM

I have READ and have been TRAINED on the **CHRISLAND SCHOOLS LIMITED SECURING A FRIENDLY AND PROTECTIVE ENVIRONMENT FOR CHILDREN** (SAFEGUARDING AND CHILD PROTECTION) SYSTEM, codified into a WORKING POLICY and accompanied by IMPLEMENTATION PROCESSES for members of staff/volunteers and I UNDERSTAND and AGREE with <u>ALL OF THE PROVISIONS</u> therein.

I therefore MAKE a SOLEMN COMMITMENT to STRICTLY ADHERE and **WHOLEHEARTEDLY** UPHOLD the PROVISIONS and IDEALS of same.

Name		
Position/Status/Designatio	on	
Contact Address		
Telephone	Email	
Signature		
Dated This	day of	2021
Appendix 3: CHILD ABUS Appendix 4: OUR CODE SUMMARY, for better ar Limited through the Des	COMPLAINTS/ALLEGATION FORM SE ACCORDING TO NIGERIAN LAW OF BELIEF (See Policy)PLEASE NC nd further DETAILS, please reach th signated Safeguarding Cordinator, w ummary version of our SAFEGUA POLICY.	(SEE POLICY) DTE THAT THIS IS A he Chrisland Schools vhose contact details