

INTRODUCTION

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are in circumstances consistent with the provision of safe and effective care; and
- Taking appropriate action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

Learners includes anyone registered at Alexanders Private School.

This document means that Alexanders Private School is committed to safeguarding and promoting the welfare of all its learners. We believe that:

- The learners in our care have the right to be protected from harm, abuse and neglect
- Every child has the right to an education
- Children should always be safe and always feel safe in school
- Every child should have access to support that matches their individual needs, including those children who may have experienced abuse
- Our learners have the right to express their views, feelings and wishes and voice their own values and beliefs
- Our learners should be encouraged to respect each other's values and support one another
- Our children have the right to be supported to meet their emotional needs as well as their academic needs
- Alexanders Private School will: contribute to the prevention of abuse; reduce the risk of involvement in serious violent crime and risk taking behaviours; prevent victimisation and bullying (including homophobic, bi-phobic, trans-phobic and cyber-bullying); will contribute to the prevention of exploitation; and work towards minimising or eliminating extreme behaviours and discriminatory views.
- Alexanders Private School acknowledges that all school staff have an important role to play in safeguarding our learners and protecting them from abuse.

Alexanders Private School will fulfil its national and international responsibilities as laid out in the following documents:

1. Working Together to Safeguard Children 2018 (Department for Education UK)
2. Keeping Children Safe in Education: Statutory guidance for schools and colleges 2019 (DfE)
3. Education Act 16 2001 - Ministry of Education, Arts & Culture, Namibia
4. Namibia's National Schools Framework 2018 - Part A: Introduction & Overview
5. Namibia's National Schools Framework 2018 - Part B: Practical Guide
6. Namibia's National Schools Framework 2018 - Part C: Resource Kit for Implementation

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the school's policies and procedures referred to below:

1. APS Code of Conduct
2. APS Grievance & Disciplinary Procedures
3. APS Behaviour Policy
4. APS Anti-Bullying Policy
5. APS Policy on Whistle Blowing
6. APS Policy on Reasonable Force

OVERALL AIMS

This policy will contribute to the protection and safeguarding of our learners and promote their welfare by:

- Clarifying the standards of behaviour required for staff and pupils
- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect and shared values
- Introducing appropriate work within the curriculum at an appropriate age
- Developing staff awareness of signs of maltreatment

- Developing staff awareness of the causes of abuse
- Developing staff awareness of the risks and vulnerabilities their learners face
- Addressing concerns at the earliest possible stage; and
- Reducing the potential risks our learners face of being exposed to violence, extremism, exploitation, discrimination or victimisation.

This means that at Alexanders Private School we will:

- Attempt to identify and protect our vulnerable learners
- Attempt to identify individual needs as early as possible; and address those needs
- Work in partnership with learners, their parents or carers and other agencies.

Our policy extends to any establishment our school commissions to deliver education to our learners on our behalf including alternative provision settings.

GUIDING PRINCIPALS

Alexanders Private School endeavours to implement seven guiding principles of safeguarding:

- Have conversations and listen to children and their families as early as possible
- Have sympathy and empathy of the child's experiences
- Work collaboratively as a staff team and with outside agencies to improve children's life experiences
- Be open, honest and transparent with families in our approach to this issue
- Empower families by supporting them and directing them to the help they may need
- Work in a way that builds on the families' strengths
- Build resilience in families to overcome difficulties

This means that at Alexanders Private School our staff will be aware of the guidance stipulated in the documents already listed above.

OUR EXPECTATIONS

All staff will:

- Be familiar with this Safeguarding & Child Protection Policy
- Understand their role in relation to the safeguarding and protecting of our learners
- Be alert to signs and indicators of possible abuse (**See Appendix 1**)
- Record concerns and give the record to the Designated Safeguarding Lead or a deputy
- Deal with a disclosure of abuse from a child in line with the guidance in Appendix 2

At Alexanders Private School:

All our staff will receive annual safeguarding training and update briefings as and when appropriate. We will follow Safer Recruitment processes and apply for Police Clearance Certificates for all staff prior to employment and bi-annually during employment with us.

THE DESIGNATED SAFEGUARDING LEAD (DSL)

The DSL will be a member of the Senior Leadership Team. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL.

Alexanders Private School's DSL team is:

Lead: Roxanne de Witt (HoD KS2)

Deputies: Louise Oosthuizen (Principal); Bianka Burger (KS4 PSHD Teacher)

Any steps taken to support a child who has a safeguarding vulnerability must be reported to the lead DSL. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to support an individual child and/or family. A written record will be made of what information has been shared, with whom, and when.

THE GOVERNING BODY - APS BOARD OF DIRECTORS

Our Board of Directors will ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare at Alexanders Private School;

- The school operates "Safer Recruitment" procedures and ensures that appropriate checks are carried out on all new staff and contract providers (including members of the board).
- The Principal and all other staff who work with children undertake safeguarding training on bi-annual to tri-annual basis with additional updates as necessary
- Temporary staff and volunteers are made aware of the school's arrangements for safeguarding & child protection and their responsibilities
- The school remedies any deficiencies or weaknesses brought to its attention without delay; and
- The Board of Directors are aware of the school's policy on safeguarding and procedures for dealing with allegations of abuse against members of staff, contract service providers and volunteers.
- The nominated Director is responsible for liaising with the Principal and DSL over all matters regarding safeguarding and child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual pupils.

At Alexanders Private School:

Our nominated Director for Safeguarding and Child Protection is: Rory O'Sullivan

This Governor will receive safeguarding training relevant to the governance role and this will be updated every 3 to 5 years.

The Board of Directors will review all policies/procedures that relate to safeguarding and child protection annually.

A member of our Board of Directors will be responsible for liaising with the relevant body in the event of allegations of abuse being made against the Principal or another member of the Board.

SAFER RECRUITMENT & STAFF SELECTION

The school should pay full regard to 'Safer Recruitment' practice including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

It also includes apply for a NamPol Police Clearance Certificate.

Evidence of the NamPol application must be recorded on our Human Resource File.

At Alexanders Private School, the following school staff has undertaken Safer Recruitment training:
Louise Oosthuizen (Principal)

And the following member of the Board of Directors has also been trained: Rory O'Sullivan.

At least one of the above-named persons will be involved in all staff recruitment processes and sit on the recruitment panel.

INDUCTION

All staff must be aware of systems within their setting which support safeguarding and these should be explained to them as part of their staff induction.

Our staff induction process will cover:

- The APS Safeguarding & Child Protection policy;
- The APS Behaviour Policy; and
- The APS Code of Conduct;

THE USE OF REASONABLE FORCE

There may be circumstances when it will be appropriate for our staff - both within the school setting or outside school setting when representing the school and under the care of school staff - to use reasonable force to safeguard children and young people.

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 to themselves or somebody else.

The word 'Reasonable' in these circumstances means 'using no more force than is needed'.

The phrase '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.

The following document has been used when drafting our school guidelines on reasonable force:

Use of Reasonable Force: Advice for headteachers, staff and governing bodies 2013 (DfE)

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

At Alexanders Private School

It is hoped that by planning positive and proactive behaviour support the occurrence of challenging behaviour and the need to use reasonable force will be reduced.

In support of this view, the following procedures have been put in place:

- The APS Behaviour Policy will be implemented accurately and consistently
Individual Behaviour Plans will be written for our more vulnerable and/or volatile learners, and these will be agreed with each individual learner and with their parents and carers;
- Children with recurring behaviour problems will be placed on a 'Special Measures Report';
- Parents and/or Carers will be kept informed at all times of negative behaviour and sanctions meted out to our learners;

- Alexanders Private School will not have a 'no contact' policy as this could leave our staff unable to fully support and protect their learners, themselves or other members of staff;
- When using reasonable force in response to risks presented learners including any learners with SEN or disabilities, or with medical conditions, our staff will consider the risks carefully; and
- A written record of learner incidents and sanctions awarded will be recorded in the Student Incident File which is stored in the School Office.

THE SCHOOL ROLE IN THE PREVENTION OF ABUSE

This Safeguarding & Child Protection Policy cannot be separated from the general ethos of tolerance and inclusiveness fostered by our school, which should ensure that learners are treated with respect and dignity, taught to treat each other with respect, have a voice and are listened to. Safeguarding issues, including online safety will be addressed through all areas of the curriculum.

Alexanders Private School:

We will provide opportunities for learners to develop skills, concepts, attitudes and knowledge that promote their safety and well-being whenever opportunities present themselves through all areas of the curriculum (cross-curricular approach);

We will provide specific opportunities for learners to develop skills, concepts, attitudes and knowledge that promote their safety and well-being through our Personal, Social Health & Development lesson (subject specific approach); and

All our policies which address issues of safety and well-being, for example The APS Behaviour Policy or the APS Anti-Bullying Policy will be inter-linked to ensure a whole school approach.

WHAT WE WILL DO WHEN WE ARE CONCERNED - EARLY HELP RESPONSE

Where unmet needs have been identified for a child but there is no evidence of a significant risk, the DSL will oversee the delivery of an appropriate Early Help response by liaising with other members of staff. The child's voice must remain paramount within a solution focused practice framework. Should it be felt that a Social Care response is needed to meet the unmet safeguarding need, the DSL will initiate a Request for Support, seeking advice from The Ministry of Gender Equality and Child Welfare.

The DSL will then oversee the agreed intervention from school as part of the multiagency safeguarding response and ongoing school-focused support.

At Alexanders Private School:

All Staff will notice and listen to our learners, sharing their concerns with the DSL in writing; Safe-guarding leaders will assess, plan, do and review plans on an on-going basis;

The Senior Leadership Team will analyse safe-guarding data and practice to inform strategic planning and staff continued professional development.

The Board of Directors will analyse safe-guarding policy to inform mid-term to long-term policy planning.

Although any member of staff at Alexanders Private School can refer a situation to the Ministry of Gender Equality and Child Welfare, it is expected that most cases will be passed through the DSL team. The DSL will generally lead on liaising with other agencies.

PEER ON PEER ABUSE

It is important that school and college can recognise that children are capable of abusing their peers, and that this abuse can include bullying, physical abuse, sexting, initiation/ hazing, upskirting, sexual violence and harassment. The school's values, ethos and behaviour policies provide the platform for staff and students to clearly recognise 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 but this

does not exclude boys as being victims or girls as being perpetrators.

At Alexanders Private School:

We will not tolerate instances of peer-on-peer abuse and we **will not** pass any incident off as “banter”, “just having a laugh” or “part of growing up”.

We will follow both national and international guidance and policies (specifically guidance and policies followed in England and Wales) to support any children subject to peer-on-peer abuse, including sexting (also known as youth produced sexual imagery) and gang violence.

We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools.

RESPONSE PROCEDURE

Our designated safe-guarding lead is [HoD Roxanne de Witt](#).
Our designated safe-guarding deputy is [Principal Louise Oosthuizen](#).
Our nominated safe-guarding director is Rory O’Sullivan.

CONCERN ABOUT A CHILD:
Speak to the designated safeguarding lead (DSL) or the deputy if urgent.
Record concerns on a Student Incident Report.

DSL to review and investigate concerns.
DSL to decide upon next steps referring to all information and options available.
DSL to consider discussing concerns with parents or carers.
DSL to seek consent were appropriate.

At any point any member of staff can consider seeking advice from:
* Nominated Director
* Ministry of Gender Equality & Child Welfare

INVOLVING PARENTS AND/OR CARERS

In general, we will discuss any Safeguarding or Child Protection concerns with parents and/or carers before approaching other agencies and will seek consent from parents and/or carers before making a referral to another agency. The appropriate member of staff will approach the parents and/or carers after consultation with the DSL.

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

Parents and carers will be informed about our Safeguarding & Child Protection Policy through the school website and via the New Parent Registration Pack.

OUR ROLE IN SUPPORTING CHILDREN

Our school staff will offer appropriate support to individual learners who have experienced abuse or those who have abused others (peer on peer abuse).

A 'Special Measures Plan' will be devised, implemented and reviewed regularly for these children. This SMP will detail areas of support, who will be involved, and the child's wishes and feelings. A copy of the SMP will be kept in the child's file, such file being stored securely in the School Office. Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a cross-staff risk assessment which shall be lead jointly by the Head of Key Stage and the DSL.

At Alexanders Private School, we will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

Alexanders Private School will work in partnership with parents and carers and other agencies as and when appropriate.

RESPONDING TO AN ALLEGATION ABOUT A MEMBER OF STAFF

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for adults in a school setting to abuse learners.

The following procedure shall be followed in any case in which it is *alleged* that a member of teaching staff, support staff, service provider, director, visiting professional or volunteer has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against a child or related to a child; or
- Behaved in a way that indicates he or she is unsuitable to work with children.

All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately (see also APS Policy on Whistle Blowing);

Allegations or concerns about staff, colleagues and visitors must be reported directly to the Principal who will liaise with the Senior Leadership Team and Board of Directors who will - together - decide on any action required. Should the allegation be against any member of the Senior Leadership Team or Board of Directors, that person will be excluded from the discussions.

If the concern relates to the Principal, it must be reported immediately to the Nominated Director - or any director if urgent - who will liaise with the SLT. The Board will decide on any action required.

Alexanders Private School has a duty to protect its staff and service providers. Allegations, therefore, will be recognised as such until proven otherwise. Unproven allegations will not have an impact on a person's continuous employment with the school.

CHILDREN WITH ADDITIONAL NEEDS

Alexanders Private School recognises that all learners have a right to be safe and to feel safe.

Some learners may be more vulnerable to abuse - for example those with a disability or special educational need or those living with domestic violence or drug/alcohol addiction in the home.

When the school is considering a suspension or permanent exclusion, a vulnerable learner or one who is the subject of a Special Measures Plan, will be considered with a holistic multi-staff risk-assessment approach prior to making a final recommendation. The final recommendation will be made by the Senior Leadership Team and proposed to the Board of Directors whom will ratify the decision if they are in agreement.

In the event of a once-off serious incident resulting in an immediate decision to permanently exclude, the risk assessment should be completed - and reviewed by the DSL and the Senior Leadership Team - prior to convening a meeting of the Board of Directors whom shall ratify - or not - the decision of the Senior Leadership Team.

APPENDIX 1

DEFINITIONS AND INDICATORS OF ABUSE

1. 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 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.

The following ***may be*** indicators of neglect:

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clothed for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example height and/or weight
- Failure to develop intellectually or socially
- Responsibility for activity that ***may not be*** age appropriate such as caring for siblings
- The child is regularly not collected from school

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 carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following ***may be*** indicators of physical abuse:

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

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 rape and/or penetration 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.

The following **may be** indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment of peers
- Unusual compliance
- Regressive behaviour such as wetting or soiling of pants
- Frequent or openly masturbating,
- The touching of others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in or around the groin

SEXUAL EXPLOITATION

Child Sexual Exploitation occurs when a child or young person, or another person, receives “something” (for example food and/or money) as a result of the child or young person performing sexual activities, or another person performing sexual activities on the child or young person.

The significant indicators of sexual exploitation include:

- Having a relationship of concern with an adult or other young person
- Entering and/or leaving vehicles driven by unknown adults
- Possessing unexplained amounts of money, expensive clothes or other items
- Having unexplained knowledge of inappropriate internet sites
- Having unexplained knowledge and/or contact with hotels, taxi companies etc

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on the child or young person's emotional development. It may involve conveying to children or young people 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.

It may involve serious bullying, causing children or young people frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of maltreatment.

The following **may be** indicators of emotional abuse:

- The child consistently describes him or herself in very negative ways – as stupid, naughty, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

RESPONSES FROM PARENTS AND/OR CARERS

Research indicates that the following responses from parents **may suggest a cause for concern** across all five categories above:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function
- Incompatible explanations offered or several different explanations
- Child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Apparent or known alcohol misuse or other drug/substance misuse
- Parent or Carer acknowledges violence between adults in the household
- There is evidence of coercive or controlling behaviour

APPENDIX 2

DEALING WITH A DISCLOSURE OF ABUSE

When a learner alleges abuse they have suffered, what should I remember to do?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her or him you are pleased that he or she is speaking to you.
- Never enter into a pact of secrecy with the child.
Assure her or 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 or him that you will start from the position that you believe them.
Children very rarely lie about abuse but he or she may have tried to tell others and may not have been heard or believed.
- Remind the child that abuse of any kind is not a child's fault.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember as much detail as you can.
- Check that you have understood correctly what the child is trying to tell you.
- Do NOT make any comments about the alleged offender. This would be inappropriate.
- 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.
- It is essential to record - as soon as you can afterwards - what you have been told in writing on a Student Incident Report Form. This should be a detailed record of the conversation using the child's own language. Include any questions you may have asked.
Do not add any personal opinions or personal interpretations.
If the disclosure relates to a physical injury **do not photograph** the injury, but record in writing as much detail as possible.
- Be aware that the child may retract what he or she has told you.

Important Note:

- (a) It is not the teaching staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk;
- (b) A staff member should not deal with this matter themselves;
- (b) Immediately after a Disclosure the staff member must:
 - (i) report clear indications or disclosure of abuse must be reported to to the Principal or DSL or - in exceptional circumstances - by the staff member directly to the nominated director or to the Ministry of Gender Equality and Child Welfare.
- (d) Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL and/or the Principal.

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Inappropriate behaviour by staff, service providers or 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 learners, sexual harassment, inappropriate phone calls and texts and images via social media as well as being physically inappropriate.
- Neglect
For example failing to act to protect a learner or failing to seek medical attention for a learner
- Spiritual Abuse
For example using undue influence or pressure to control individuals or ensure obedience, or following religious practices that are harmful.

If a child makes an allegation about a staff member, a service provider or a volunteer, the principal must be informed immediately. The Principal must carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Principal should not carry out the investigation alone nor interview other learners.

The Principal should exercise and be accountable for their professional judgement 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 Teacher will notify the Senior Leadership Team Trust to establish the needs of children likely to have been affected.
The Principal's findings must also be reported to the Board of Directors.
The Principal and Board of Director's will make contact with the Ministry of Gender Equality and Child Welfare.
- 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 learner then these issues should be addressed through the school's own disciplinary procedures (for staff and learners).
- If the Principal - in conjunction with the Senior Leadership Team - 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 Student Incident Report.
The allegation should not be recorded in the staff member's file.

Where an allegation has been made against the Principal, then the nominated director takes on the role of liaising with the Senior Leadership Team and the Board of Directors in lieu of the Principal.

All other procedures are followed as above.