

Preamble

Rift Valley Academy desires to uphold the Biblical tenet that every individual shall be treated with dignity, care, and respect. The administration further seeks to model principles of godly leadership, justice, and compassion. We recognize the innate vulnerability of children and their dependence on adults to protect and nurture them. We place an emphasis on child protection as integral to RVA's core values, recognizing that in protecting the weak we are honoring the Lord whom we love, serve, and bear witness to. The devastation created by harm to children in its many forms is deplored. The safety of the child is paramount and will guide RVA in the process of evaluation and decision-making in situations that involve harm or possible harm to a child.

Definitions & Scope

- A child is a person under the age of 18 as well as any RVA student whether or not they are under the age of 18 years. These statements apply to any child of a RVA staff member who is living on the RVA campus as well as any child who is in attendance at RVA as a RVA student.
- RVA staff and volunteers includes all teaching, counseling, dorm parent, support, and administrative staff whether paid or missionary, volunteers, all national staff and anyone working at or for RVA
- The "complainant/victim" is the person who is alleged to have been harmed
- The "accused" is the person who is alleged to have caused harm

Policy Statements

- A.** RVA has a named Child Safety Coordinator who oversees all child safety matters and is designated to receive and act as the central repository for all child safety reports. The Child Safety Coordinator is accountable to the Superintendent who is accountable to both the RVA School Board and to the AIM International Director.
- B.** RVA staff and volunteers shall be adequately screened prior to starting their service at RVA. When any member of staff works at RVA without coming through a formal mission agency, it is RVA's responsibility to do due diligence in screening.
- C.** RVA staff and volunteers shall not be accepted to serve/work at RVA if they have been convicted of any form of abuse of a child.
- D.** RVA staff and volunteers shall have signed the Staff Code of Conduct before starting their service at RVA. The safety, security, and well-being of children are vital in all of RVA's ministries, services, and activities. RVA staff and volunteers assume the full responsibility of setting and maintaining clear and appropriate boundaries in all interactions with every child. Anyone working with children in the context of a RVA setting is required to comply with the Staff Code of Conduct and to sign that they agree to do so. The Staff Code of Conduct provides RVA's expectations for all adults without exception. Any observation of blatant, repeated, or intentional disregard or violation of the Staff Code of Conduct or any actual harm to a child shall be immediately reported to RVA Administration or the Child Safety Coordinator who will inform the Superintendent.
- E.** RVA staff shall be familiar with this policy and act professionally and in a mature Christian manner in all aspects of this policy.
- F.** RVA staff, volunteers, and students must take prompt action to put an immediate end to any instances of abuse, sexual harassment, bullying, and/or inappropriate behavior that they witness or become aware of.
- G.** All incidents or suspected harm to a child will be reported to the RVA Administration or Child Safety Coordinator without delay.
 - All reports of student to student harm shall be responded to according to this Child Safeguarding Policy.
 - All reports regarding the misconduct of a national staff member shall be responded to according to this Child Safeguarding Policy.
 - All reports regarding the misconduct of a current or former expatriate RVA staff member or volunteer will be directly referred to the AIM Child Safety Office by the Child Safety Coordinator or the Superintendent. Email Address: csio.io@aimint.org
 - Whenever a student or adult from a mission agency other than AIM is involved; RVA shall contact their child safety officer (appropriate parties) as soon as the initial inquiry has been done and the report has been deemed credible.
- H.** RVA shall assess all reports of suspected child abuse by carefully following the procedures laid out according to this Child Safeguarding Policy. Every attempt will be made to conduct a thorough and unbiased assessment of the report.
- I.** The AIM Child Safety Officer is available for consultation at any stage during any report.

- J. RVA shall endeavor to provide reasonable follow up care for victims of abuse, sexual harassment, bullying, inappropriate behavior, and for the affected community.
- K. RVA will make every reasonable effort to protect the complainant and accused from retaliation. Retaliation against the complainant or accused, from any source, or any attempt to interfere with the assessment shall not be tolerated and may be grounds for dismissal from the student body or from the staff of RVA.
- L. Confidentiality shall be maintained on a strictly “need-to-know” basis.
- M. Mandatory education of staff and students regarding prevention and signs of abuse and neglect shall be provided on an annual basis.
- N. Staff, parents, and students will be clearly informed of this Child Safeguarding Policy and its procedures.
- O. This policy shall remain effective by regular review against current best practice and lessons learned from internal reviews and external audits.

Definitions of Abuse and Inappropriate Behavior

Normal healthy human relationships between adults and children include expressions of care and affection. Adults working with children are encouraged to provide a warm, supportive, and nurturing environment.

The following definitions of abuse and inappropriate behavior will be applied to reports involving any RVA staff, national staff, volunteers, parents, guardians, family members, campus visitors, students with an age differential of more than three years, or others regarding incidents affecting RVA students that occur on the RVA campus and/or at RVA sanctioned events, or that have a significant negative impact on the educational environment of RVA.

It is recognized that local and/or national definitions of abuse and inappropriate behavior may vary, and there are cultural, religious, and ethnic differences in parenting and education. These definitions have been written with an awareness of the various cultures represented at RVA and thus will be applied regardless of individual culture. They are also subject to Kenyan law as far as it applies. This policy is consistent with globally recognized definitions of abuse.

A. Definition of Abuse

Abuse is the maltreatment of any child, often in the context of a relationship of responsibility, trust, or power, which endangers or impairs the health or welfare of that child. Child abuse can occur with or without the consent of the victim. In the context of this policy, definitions include sexual abuse, physical abuse, emotional abuse, neglect, and grooming. The definitions below are not limited to the examples given.

1. Sexual Abuse

“Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limit to: - the inducement or coercion of a child to engage in any unlawful sexual activity; -the exploitative use of a child in prostitution or other unlawful sexual practices; -the exploitive use of children in pornographic performance and materials.” WHO Consultation on Child Abuse Prevention 1999

Sexual abuse is the involvement of a child in sexual activity by an adult or another older child involving contact or no contact. For example:

Verbal – Remarks which include sexual threats, solicitation, sexually explicit language (whether in person, on the phone, via text message or the internet); as well as any verbal expression with the intent to arouse, stimulate, or humiliate.

Visual – Indecent exposure, showing or taking of suggestive pictures, showing or sending pornographic material of genitals or the showing of unclothed persons; as well as any sexual activity or simulated sexual activity such as masturbation or simulated intercourse, peeping, or leering.

Physical – Physical contact (or penetration by penis, fingers, or any other body part or object) with a person’s clothed or unclothed genitals, pubic area, buttocks, or the female breast, or causing a child to perform any of these acts; as well as masturbation in front of or to the victim, rubbing, holding, or kissing for the purpose of sexual gratification.

2. Physical Abuse

Physical abuse is any act that results in a non-accidental injury. Physical discipline by parents of their own child, such as spanking, is not considered abuse as long as it is reasonable, not done in inappropriate anger, and does not

significantly injure the child. The physical punishment of an unrelated child whether or not it causes injury is not permissible.

3. Emotional Abuse

Emotional abuse is usually a pattern of behavior characterized by a person subjecting or exposing another to harmful behavior that may result in significant psychological trauma, including isolation, anxiety, depression, or post-traumatic stress disorder. It includes acts of commission, and acts of omission. This includes, but is not limited to, ridicule, teasing, shouting, yelling at, scapegoating, humiliating, deliberately excluding a child or belittling them in front of others.

4. Neglect

Neglect is maltreatment by the significant and unreasonable failure to provide a student with basic needs of food, clothing, warmth and shelter, safe living conditions, emotional security, physical security, protection, medical & dental care, cleanliness, education, and appropriate supervision reasonably available to the family or caretakers. To be considered neglect, the failure to provide these needs must also cause, or have a high probability of causing significant harm to the child's health or physical, emotional, spiritual, or social development. The presence of poverty leading to lack of basic physical needs is not considered to be willful neglect. The determination of when neglect meets the definition of abuse will be made at the discretion of the Child Safety Team.

5. Grooming

Grooming is a subtle pattern of behavior consistent with an adult intentionally enticing a child into an emotionally dependent or sexual relationship. Indicators of grooming behavior may include but are not limited to the following: developing an "exclusive" relationship with a child; inappropriately encouraging a student to overstep rules; crossing boundaries of appropriate behavior with a child either physically, verbally, or emotionally; inappropriately extending a relationship with a child outside of the assigned environment (i.e. texting or meeting privately); sexualizing the relationship with a child either physically, verbally, or emotionally; isolating the student from other relationships; deliberately using strategies to maintain the secrecy of the relationship. Grooming behavior may be present when some, but not necessarily all, of these indicators are met. The determination of when grooming has occurred will be made at the discretion of the Child Safety Team. If the team determines that grooming has occurred, then it will be found that abuse of a child has occurred.

B. Definition of Inappropriate Behavior

If behavior is identified that raises concerns regarding the treatment of a child, but does not meet RVA's definition of abuse, a conclusion of inappropriate behavior will be reached. This may occur when the Staff Code of Conduct has been breached but harm has not occurred, or where harm has been negligible.

In this case, normal disciplinary procedures will be followed which are not outlined in this RVA Child Safeguarding Policy.

Definition of Sexual Harassment and Inappropriate Behavior

A. RVA has adopted the following definition of sexual harassment:

Sexual harassment is a form of abuse and consists of unwelcome sexualised behaviour targeting an individual or individuals. This may occur online or offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive, or sexualized environment.

It can occur among or between students or adult staff and includes but is not limited to:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and/or displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos, sexting; inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be stand-alone or part of a wider pattern of sexual harassment and/or sexual abuse

Sexual harassment, as set out above, creates an atmosphere that, if not challenged, can normalise inappropriate behaviors and provide an environment that may lead to sexual abuse and harm.

B. Definition of Inappropriate Behavior

If behavior is identified that raises concerns regarding the treatment and social interactions of a child, but does not meet RVA's definition of sexual harassment, a conclusion of inappropriate behavior will be reached. Cases of a sexual nature between students will be considered on a case-by-case basis with a focus on trying to understand the motivation of the behavior. Factors to be considered are the age difference between the students involved, the type, frequency, and intensity of behavior and the use of influence, force, or coercion involved. Sexual interaction in the context of a consensual dating relationship will not normally be considered a Child Safety matter.

In this case, normal disciplinary procedures will be followed which are not outlined in this [RVA Child Safeguarding Policy](#).

Definition of Bullying and Harassment

"Bullying occurs when a person or group is intimidated, frightened, excluded or hurt by a pattern of reoccurring behaviors directed at them by others." "Bullying in Schools – The Hidden Curriculum" Greg Griffiths 2003

The following actions in an ongoing form may include but are not limited to:

- Physical aggression (including hitting, punching, kicking)
- Teasing or verbal abuse (including insults, name calling, racial remarks)
- Discrimination based on characteristics such as age, race, ethnicity, religion, sex, family status, physical or mental abilities
- Intentional exclusion from activities or friendship groups
- Setting up humiliating or insulting experiences
- Damaging a person's property/possessions or taking them without permission
- Threatening gestures, actions or words to a person or his/her belongings
- Written/verbal/electronic messages that contain threats, putdowns, gossip or slander
- Cyberbullying is defined as: "the willful and repeated harm inflicted through the use of computers, cellphones, and other electronic devices." Hinduja & Patchin Cyber Bullying Center 2014

Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone as well as using electronic means to harass, threaten, intimidate, or embarrass. This is true whether or not the information is shared within a closed group or on a public forum. The use of a digital platform places the shared communication in the public domain and if discovered is determined to be harmful.

The inquiry process is the same, with the exception that a [RVA Administrator](#) may do the initial inquiry in consultation with the [Child Safety Coordinator](#) but the [Child Safety Coordinator](#) does not need to be present during the initial inquiry. All steps of the inquiry process must be followed by the [RVA Administrator](#) regarding documentation, etc. More information regarding rationale, prevention & education, reporting, and responsibilities can be found in RVA's [Bullying Policy](#).

Rights & Responsibilities of the complainant/victim of harm

1. If the person causing harassment is another student, the complainant shall let the harasser(s) know that their advances or comments are unwanted and they want them stopped.
2. If the behavior is to a degree that to approach the person is intimidating or if the unwanted behavior continues, the victim shall report the matter to the [RVA Administration](#) or the [Child Safety Coordinator](#) without fear of embarrassment, reprisal, or breach of confidentiality.
3. The complainant has the right to bring another individual of his/her choosing when complaints are registered to the [RVA Administration](#)
4. The complainant is expected to cooperate throughout the inquiry by providing all available information and refraining from talking about the inquiry with anyone outside of the agreed circle of confidentiality.
5. The complainant/parents of the complainant will receive formal feedback at the end of the inquiry with all the relevant information which pertains to their complaint and any school improvements.
6. The complainant/parents of the complainant have the right to take their complaints to the [RVA School Board](#) if they feel the administration has failed to satisfactorily resolve the issue.

Rights & Responsibilities of the student(s) alleged to have been causing harm

1. To be informed that a complaint has been filed and to have their identity kept as confidential as possible
2. To have the report treated in an impartial manner. The initial inquiry process may require that an alleged harasser is removed from classes, activities, etc. until the initial inquiry is complete. This does not indicate guilt but that the Child Safety Team is following standard protocols in order to ensure fairness and non-bias as information is gathered.
3. The student(s) may or may not be given opportunity to bring another individual of his/her choosing depending on circumstances such as opportunity to collude with others, timing constraints, etc.
4. To cooperate throughout the initial inquiry by telling the truth and providing all available information (i.e. digital communication, images, etc.)
5. To refrain from contacting the complainant or from talking about the inquiry with anyone outside of the agreed circle of confidentiality.

Communication with Parents, Guardians, and/or Dorm Parents

The gathering of information will involve interviewing students. The decision to inform parents, guardians, and dorm parents before speaking to students is made on a case-by-case basis. It is a decision governed by the need to secure information in a prompt & decisive manner in order to avoid collusion between students & our desire to include parents as much as possible. Parents will be informed in writing of outcomes as soon as is practically possible. RVA staff members directly responsible for the care and wellbeing of the student(s) will be informed to an extent that enables them to effectively support and care for the student(s) involved.

Child Safety Inquiry Process

All reports will be responded to objectively, thoroughly, and compassionately. The Child Safety Coordinator and the Child Safety Team will be trained sufficiently to undertake this task under the authority of the Superintendent. There will be a consistent response to any Child Safety report whether current or historic. All information will be gathered without bias and all findings and outcome decisions will conform to our stated definitions and policy guidelines.

The primacy of confidentiality is balanced between the principle of limiting the circle of people involved within the category of "need to know" and necessity of gathering enough relevant information to determine an outcome decision. The inquiry process is documented from beginning to end, surplus information deleted, and then final reports are kept in a secured location.

Initial Inquiry

1. All child safety concerns are brought to the Child Safety Coordinator by RVA staff, students, and administration.
2. Any child safety concern involving national staff must automatically require the inclusion of the Director of Services and the Human Resources office.
3. During this process, the immediate safety and wellbeing of the complainant is secured. If a national staff member is involved this may require immediate suspension of duty pending a staff misconduct inquiry. If an expatriate staff member is involved, then this is referred directly to the AIM Child Safety Officer who will assume responsibility for the inquiry. If a student is involved this may mean removing the complainant and/or the accused from classes and activities until the initial inquiry is complete.
4. The Child Safety Coordinator makes an initial assessment of the report in conjunction with at least one other child safety team member who is there to take thorough notes as well as to ask clarifying questions.
5. Additional information is gathered from all relevant sources, such as dorm parents, teachers, witnesses, and counselors. This is an initial inquiry and does not include formal interviews at this point. Confidentiality is kept tight and strictly "need to know".
6. The Child Safety Protection Network Child Safety Assessment Tool is used to analyze this initial information and to make a decision about potential outcomes.

Formal Inquiry

7. If there are grounds to pursue the initial report and to gather further information in a formal inquiry, the RVA Administration or Child Safety Coordinator will inform the student/national staff member alleged to have caused harm of the accusations against them and that a formal investigation will proceed.
8. The Child Safety Team will make a decision as to who else should be informed, including parents, dorm parents, and/or mission agencies/sending organizations. In some situations, students will be interviewed or re-interviewed without the parent's prior knowledge or consent. This is determined when there is an overriding need to obtain data

and information in a systematic interviewing manner which avoids collusion between students. Parents will be informed as soon as practicable.

9. Using the CSPN Child Safety Assessment Tool; formal interviews will be conducted with a view to assessing all safety issues both individual to the child and wider school risk areas. Interviews are done by two Child Safety Team members according to CSPN Best Practice, with notes documented and securely filed.
10. Continually analyze all available information and add additional interviews as needed to create the fullest picture possible.
11. A decision is made by the Child Safety Team in consultation with a non-RVA consultant as to whether to proceed according to options below:
 - a. No further action - does not meet the threshold for harm.
 - b. Refer to school Student Support Team as a non-child safety, pastoral, or disciplinary matter. Pastoral responses may include compassionate leave, referral to counseling at RVA or elsewhere, or regular meetings with pastoral staff, a mentor, or a coach. Disciplinary responses may include formal apologies, additional supervision, demerits, and/or exclusion from the RVA school community (including suspension, expulsion, or suspension of employment).
 - c. Implementation of a child safety plan that may include formal apologies, additional supervision, compassionate leave, referral to counseling at RVA or elsewhere, demerits, exclusion from the RVA school community (including suspension or expulsion), termination of service, termination of employment, involvement of the criminal justice system(s), and/or education in the wider school community.
 - d. If it is determined that the complaint was made out of malice and with no substance, discipline may be affected against the complainant and every effort will be made by the RVA Administration to restore respect for the accused.
12. The rationale for any of the above decisions must be clearly documented.
13. Write up findings. This document includes a summary report, information gathered in interviews, outcome decisions, and action steps. This statement of findings should document all processes and outcomes. Keep files clearly documented and hard copies in a central location.
14. Formulate a child safety plan to ensure adequate care, safety, and follow up of affected child/ren. The child safety plan should also include wider contextual safety issues in order to protect other children at RVA.
15. Recommended outcomes and action steps should take into consideration the seriousness of the infraction, the frequency and nature of the infraction, the impacts on the victim(s), the age and vulnerability of the victim(s), and other factors.
16. The victim(s) and the accused, as well as their parents, will be informed of the administrative decision in writing.

After Action

17. Use the CSPN Child Safety Impact Tool to identify ongoing risks and vulnerabilities for the school, the community, and other students. Make changes administratively as necessary.
18. Debrief with members of the Child Safety Team. Take note of lessons learned and what could have been done differently. Use lessons learned as a basis for RVA staff education and training.