



CHILD SAFETY POLICY & PROCEDURES

Introduction

Rift Valley Academy (RVA) desires to uphold the Biblical tenet that every individual shall be treated with dignity, care, and respect. RVA recognizes the innate vulnerability of children and their dependence on adults to proactively protect and nurture them. RVA places an emphasis on child protection as integral to the school's core values. The safety of the child is paramount and will guide RVA in the process of evaluation and decision-making in responses that involve harm or possible harm to a child.

RVA also recognizes the need to protect those who work with students. RVA staff, volunteers, and contract workers deserve the security of working in a setting where processes and procedures are in place to minimize the possibility of erroneous accusations.

RVA is an Associate Member of the Child Safety & Protection Network (CSPN). CSPN is a collaborative network of mission agencies, faith based NGOs, and international Christian schools intentionally and strategically addressing the issues of child protection.

RVA has made a commitment to abide by local law and will comply with legal requirements in reporting as necessary. This policy establishes the criteria for the provision of a safe environment for children and school personnel.

Definitions Related to Abuse & Harm

Child abuse is any action by another person, adult or child, that causes significant harm to a child. The Faith Trust Institute states, "Child abuse refers to an act committed by a parent, caregiver or person in a position of trust (even though he/she may not care for the child on a daily basis) which is not accidental and which harms or threatens to harm a child's physical or mental health, or a child's welfare." Child abuse can occur with or without the consent of the child and can occur in a one-on-one encounter or in a group setting.

In the context of this policy, a child is considered any person under the age of 18 years, as well as any RVA student whether or not they are under the age of 18. All policies apply to currently enrolled RVA students as well as to any child of an RVA staff member who is living on campus. In the case of alleged child-to-child abuse or harm, behaviors will typically be considered abusive if there is a significant difference in age, responsibility, trust, power, development, awareness, or understanding.

Types of Abuse & Harm

The following definitions will be applied to reports involving adults and children, including RVA missionary staff, national staff, volunteers, parents/guardians, family members, campus visitors, and students. It is recognized that local and/or national definitions of abuse and inappropriate behavior may vary, and that there are cultural, religious, and ethical 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.

Physical Abuse

Physical abuse is an act that results in non-accidental physical injury and may be the result of a single or repeated incident(s). Such acts may include, but are not limited to: slapping, punching, beating, kicking, biting, shaking, burning, holding under water, pulling hair, or extreme and unnecessary restraint. It includes unreasonably severe corporal

punishment or unjustified punishment. Physical discipline by parents of their own child, such as spanking or paddling, is not considered abuse as long as it is reasonable, not done in inappropriate anger, does not significantly injure the child, and the child is capable of learning from the discipline.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child. It can include acts of commission and/or acts of omission and can occur verbally, in writing, or online. This includes, but is not limited to: ridicule, teasing, yelling at, scapegoating, humiliating, deliberately excluding a child, belittling a child in front of others, or spiritually manipulating behaviors.

Sexual Abuse

Sexual abuse is the involvement of a child in sexual activity with an adult or another child which uses physical and/or emotional sexual stimuli or acts in the presence of an individual or upon an individual. This can occur with or without consent and can involve contact or no contact. Forms of sexual abuse include but are not limited to:

- Verbal: remarks which include sexual threats, solicitation, sexually explicit language (whether in person, on the phone, via text message or the internet), or any verbal expression with the intent to arouse, stimulate, or humiliate
- Visual: indecent exposure, taking suggestive pictures, showing or sending pornographic material of genitals, the showing of unclothed persons or sexual activity, simulated sexual activity such as masturbation or 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

Grooming

Grooming is a subtle pattern of behavior consistent with an adult intentionally enticing a child into an emotionally dependent or sexual relationship over a period of time, resulting in greater trust being placed in the adult. Increased trust permits him or her greater access to, control over, and privacy with the child, thereby placing the child at greater risk of harm or abuse. Grooming can occur face-to-face or online.

Neglect

Neglect is maltreatment by the significant and unreasonable failure to provide a child with basic needs of food, clothing, warmth and shelter, safe living conditions, emotional security, physical security, protection, medical and dental care, cleanliness, education, and appropriate supervision reasonably available to the family and/or caregivers. The presence of poverty leading to a lack of basic physical needs is not considered willful neglect.

Exploitation

Exploitation is the action of treating someone unfairly in order to benefit from his/her work. Exploitation is any activity that takes advantage of a child that could harm his/her welfare and development. This includes, but is not limited to, sexual and commercial exploitation.

Bullying & Harassment (*see RVA's "Bullying & Harassment Policy" for more information)

Bullying is defined as unwanted, aggressive behavior by an adult or child towards another child that involves a real or perceived power imbalance and is repeated or has the potential to be repeated. It may include a wide variety of physical or verbal conduct. Types of bullying may include: verbal, social, physical, cyber, racial, homophobic, and sexual bullying. Harassment is repeated subtle or overt action, particularly by a person in a position of trust or authority, which causes the recipient to feel attacked, demeaned, intimidated, and/or manipulated. Sexual harassment consists of unwelcome sexual behavior targeting an individual or individuals and may occur online or offline. Sexual harassment is likely to violate a person's dignity and make him/her feel intimidated, degraded, or humiliated and/or create a hostile, offensive, or sexualized environment.

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 if the staff Code of Conduct has been breached but harm has not occurred, or where harm has been negligible. Inappropriate behaviors may include but are not limited to: verbal aggression, unwanted hugs, teasing, mocking, or inappropriate electronic communication.

Prevention & Safety Measures

RVA has a named Child Safety Coordinator (CSC) who oversees all child safety matters and is designated to receive and act as the central repository for all child safety reports and responses. The CSC will lead the Child Safety Response Team, which is a group of school personnel who sensitively assess and respond to suspicions, disclosures, or reports of harm to a child. Members are committed to knowing and following the school's Child Safety Policy and Procedures and have received Response Team Training from CSPN. The CSC is accountable to the Superintendent, who is accountable to the RVA School Board and the AIM International Director.

RVA staff and volunteers will be adequately screened prior to beginning their service at RVA. Screening will include a criminal background check and may include reference checks, interviews, and any other screening processes deemed necessary. Individuals who have been accused, convicted of, or are under the suspicion of crimes against children, or who have been convicted of violent crimes or other relevant crimes, will not be permitted to serve at RVA.

All staff, volunteers, and contracted workers with regular recurring responsibilities on campus will receive annual training regarding recognition, prevention, reporting, and responding to abuse and harm. Staff and volunteers will review RVA's Child Safety Policy and Procedures and agree to and sign the Code of Conduct.

RVA students will receive age appropriate annual education regarding the following: definitions of abuse and harm, reporting a suspicion, concern, or disclosure of abuse or harm, student rights and responsibilities, and personal safety.

RVA's child safety program will be regularly evaluated through internal reviews and external audits in order to ensure that the following are in compliance with this policy: governance, definitions, screening, training, child care, response process, and member care.

Supervision of all school personnel will be intentional and will take place through both formal and informal visits to classrooms and programs by department heads, principals, and/or other program leads. Parents and/or dorm parents are responsible for knowing where their children are at all times when on campus. In a school or dorm context, parents/dorm parents will be informed of planned activities (e.g., trips included in the schedule for the term) and sign a consent form when appropriate. Parents/dorm parents shall be encouraged to make unannounced visits to program activities.

All staff and volunteers are expected to ensure a safe environment in their planning and evaluating of all activities. Safety guidelines for various programs (e.g., field trips, interims, safos, mentoring, etc.) must be in place and implemented and staff are responsible to provide supervision that will safeguard students and is in line with RVA's Code of Conduct. Safety precautions are to be communicated to children as well as to parents/care givers. Staff, students, and parents will have access to RVA's Child Safety Policy & Procedures at all times online. To further protect students, computer and technology use guidelines are also in place.

Before commencing service at Rift Valley Academy and every year thereafter, each staff member, volunteer, and contracted worker with regular, recurring responsibilities on campus must read and agree to abide by the Code of Conduct for Child Safety as well as sign the following acknowledgement form.

- I have attended or watched this year's [year] RVA training in child protection.
- I have read (within the last 30 days) RVA's Child Protection Policy and Procedures.
- I agree to abide by the Code of Conduct in RVA's Child Protection Policy.

- I have not engaged in sexual abuse, physical abuse, a pattern of emotional abuse, or the exploitation or neglect of a child and agree not to engage in any such behaviors.
- I have never been the subject of a complaint, disciplinary action, or dismissal by an employer, church, ministry, or other volunteer organization following an allegation of any form of child abuse. (Note: If I have been the subject of an allegation of any form of child abuse, regardless of the outcome of the allegation, I have notified the RVA Superintendent, whose responsibility is to notify the Child Safety Coordinator/CSC.)
- I have never been the subject of an investigation of any form of child abuse by civil authorities.
- I understand RVA takes allegations of child abuse seriously and that abuse in any form will not be tolerated. I understand that RVA will cooperate with civil authorities in the investigation of any report of abuse.
- I undertake to report any suspicion, concern, or disclosure of any child being at risk of harm, whether in school or outside of school, immediately to hubcoordinator@rva.org or, in the event of an emergency, to the CSC at [#].
- I undertake to report any identification of a student engaging in self-harm or having suicidal thoughts to hubcoordinator@rva.org or, in the event of an emergency, to the on call counselor at 0796 114 525.
- I have read this acknowledgement form, understand its contents, and voluntarily sign it.

Code of Conduct for Child Safety

Staff members and volunteers assume the full responsibility of setting and maintaining clear, appropriate boundaries in all interactions with children. This Code of Conduct is meant to support the following:

- Providing a safe environment for students in which they can learn, develop, and thrive
- Ensuring that adults model safe and healthy interactions
- Protecting those interacting with and serving students from unsound reports of inappropriate behavior

In settings where children are present, staff should employ at least one, but as many as possible, of the following safeguards.

Visibility

“Is it possible for others to see me?” When working with children, adults should position themselves in places visible to other unrelated adults. This can be accomplished by remaining in view of a window or keeping doors open, and by planning activities in areas where other adults are present and at a time when other activities are occurring.

Accountability

“Do others know where I am and what I am doing?” One-on-one interactions with children should occur with accountability to another unrelated adult and with unrelated adults in the vicinity. It is expected that, whenever possible, two unrelated adults will be present in work with children, or that children are in diverse groups as part of scheduled events. It is understood that the two unrelated adult rule is not always realistic in our boarding setting, but every effort will be made to avoid isolation.

Balance of power

“Do children feel safe in my presence?” Adults, by virtue of their age, size, strength, and authority, exert control over children. Balancing power enhances child safety and can be accomplished through various means such as avoiding one-on-one situations as much as possible (e.g., driving with more than one student in the car) and getting on eye level with students when communicating with them.

Discipline

Discipline should be used to teach and correct rather than to punish. The following actions can cause harm to children and should be avoided:

- Hitting, slapping, or any behavior that assaults a child
- Belittling, shaming, or yelling at a child, derogatory name calling, ridicule, humiliation, or publicly calling a child out for the purpose of negative treatment or exclusion

- Pushing or holding a child against his/her will outside the goal of protecting the child from danger, providing medical care, or keeping the child from harming himself/herself or others

Touch

Touch should be in response to the needs of the child and not the needs of the adult. Touch should be age-appropriate and generally initiated by the child. It should be done with the child's permission and in view of others, and any resistance from the child should be respected. The following signs of affection are generally appropriate within specific contexts: verbal praise, side hugs, pats on the shoulder, back, or head (when culturally appropriate), and touching a young child's hands, face, shoulders, and arms or holding him/her when others are present. The following behaviors can cause harm to children and should be avoided:

- Touching of buttocks, chest, genital area, or thighs
- Sleeping in bed with a child
- Any behavior that could be interpreted as sexual in nature, including flirtatious or seductive looks, or showing sexually suggestive videos
- Doing things of a personal nature for children they are able to do for themselves (e.g., dressing, bathing)

Communication

Words should be used to support and encourage children. (Please see the Social Media & Digital Communication Policy for more information regarding appropriate online communication with students.) The following interactions, whether verbal, written, or online, should be avoided:

- Shaming, belittling, bullying, humiliating, and name calling
- Using harsh language that may frighten, threaten, or humiliate
- Cursing or making derogatory remarks about the child, their family, and/or their place of origin
- Inappropriate comments that relate to physique or body development, any sexually suggestive comments or pictures, telling off-color or sexual jokes, or inappropriately discussing sexual encounters or desires with children

Adults should also avoid favoring or showing differential treatment to particular children at the exclusion of others, or excluding children in a derogatory or embarrassing way in the presence of others.

Reporting Procedures for Suspected Harm

Any staff member or volunteer who 1) has an indication or suspicion of concern regarding child safety, 2) receives a disclosure of harm, or 3) discovers alleged abuse amongst staff and/or students, regardless of where it may have occurred, must fill out a confidential, written report using the Concerns Referral Form which can be found on RVA's school website under the tab About Us/Child Safeguarding and email it to hubcoordinator@rva.org or contact the Child Safety Coordinator. Even if there is reason to doubt a report, the reporter must immediately communicate the information accurately and completely. There must not be any attempts to handle the situation privately or perform any preliminary interviews/response.

During the reporting process, RVA will provide immediate safety and appropriate care for each person involved. Support will be offered to students, respondents, and reporters during and after the response process.

Upon receipt of a report, the CSC and at least two other members of the Response Team will review all information and determine next steps according to policy. In most cases, parents and/or dorm parents of children harmed or allegedly causing harm are contacted if, and when, it is determined that a child safety response is required, unless to do so would place the child at a greater risk of harm. Parents and/or dorm parents may or may not be notified before their child is interviewed or before outcome decisions are made secondary to the need to gather information in a timely manner. In addition, designated personnel evaluate whether a report to authorities is required.

Child Safety Response

RVA will comply with the Child Safety and Protection Network recommendations for responses which may include an Initial Assessment, a Child Safety Assessment, and a Misconduct Assessment. The Response Team is expected to fully respond to all reports of possible harm in a timely manner with objectivity and fairness. A response will include the following: planning, gathering information, analyzing information, and determining outcome decisions. The CSC will confer with a non-RVA consultant throughout the response process for increased accountability and objectivity.

Staff, volunteers, students, and family members are expected to fully cooperate in any response. Anyone who conceals information or knowingly provides false or misleading information will be subject to appropriate disciplinary action up to, and including, dismissal or termination of enrollment.

In the event that a current or former expatriate RVA staff member or volunteer is alleged to have harmed a child, the report will be directly referred to AIM's Child Safety Officer (CSO) at cso.io@aimint.org. AIM's CSO will assume responsibility for the Misconduct Assessment and RVA will proceed in a supportive role. If a national staff member is alleged to have harmed a child, the Director of Services and Human Resources Manager will be notified, and RVA's Response Team will conduct a Misconduct Assessment.

Ordinarily, the adult suspected of harm is immediately removed from campus, pending the results of a Misconduct Assessment, in order to provide immediate safety measures and decrease future harm or risk of harm. In the event that a student is suspected of causing harm, the student may be removed from classes and activities until the initial assessment is complete in order to decrease potential harm.

Throughout the response, the Response Team will continually evaluate the needs of the individuals involved and consider persons who need to be informed of the process. Care will be exercised to protect both the student(s) harmed and the individual(s) who is/are alleged to have caused harm by restricting information access to those who need to know. The Response Team will maintain a neutral stance until the conclusion of the response. During interviews, a response team member of the same gender of the interviewee will be present when possible, and every effort will be made to provide a translator if needed. Two response team members will always be present during an interview, one acting as interviewer and the other acting as scribe.

If it is determined that the initial concern was reported out of malice and with no substance, the reporter may receive appropriate discipline by RVA administration, and every effort will be made to restore respect for the respondent. If a report of concern is mistaken or inaccurate, but was made in good faith, the person making the report will not be subject to any form of disciplinary action. If it is found that criminal offenses occurred, offenses will be reported to the proper authorities. Due diligence will be carried out to identify other potential children harmed.

The child(ren) and his/her parents, the respondent(s), and the reporter will be informed of the child safety response outcome(s) in writing, with appropriate information included for each party.

Closing the Response

After an Initial Assessment, Child Safety Assessment, and/or Misconduct Assessment have been completed, a Statement of Findings will be submitted to the Superintendent. Depending upon the results and outcome decisions of the response, the following may occur:

- Implementation of Child Safety Plan(s): The Child Safety Coordinator will ensure that the safety plan(s) recommended by the Response Team is/are implemented.

- Administrative Action: Administrative action may be recommended depending upon the results of a Misconduct Assessment and/or a Child Safety Assessment.
- Final Communications: All findings will be documented. Documents may include interviews, records checks, initial assessment, response plan, child safety assessment, child safety plan, misconduct assessment, misconduct findings report, organizational improvement plan, implementation and monitoring of safety and action plans, etc. A final Statement of Findings should also be included in response documentation, including the rationale for decisions. Records should document all processes and outcomes. Files will be clearly documented and maintained permanently.
- Organizational Improvement Plan: The Response Team will identify ongoing risks and vulnerabilities for the school, community, and other students. Changes will be recommended to administration regarding organizational improvements. The organizational improvement plan will also include recommendations regarding improving the child safety response process.
- Monitoring of safety and action plans: The Child Safety Coordinator will regularly monitor any safety or action plans for the recommended time frame, documenting follow up.

In confirmed cases of abuse, outcome decisions will mandate the following:

- In every confirmed case of child abuse committed by a staff member, the Superintendent will terminate the staff member's service with no possibility of reinstatement. The CSC will report these cases, where applicable, to the staff member's sending agency, certification agency, the local police and social services, and any other appropriate government agency in the staff member's passport country.
- In confirmed cases where a child has been abused by a volunteer or parent of a student, whether the abuse occurred inside or outside RVA's jurisdiction, the offender will be denied further opportunities for volunteer service and may be denied access to school facilities. Reporting to authorities will occur as required.
- Confirmed cases of abusive behavior committed by a student will be evaluated on a case-by-case basis, taking into account factors such as age, seriousness of the offense, acknowledgment of responsibility, and effective treatment, and may result in immediate termination of enrollment.
- If RVA becomes aware that abuse occurred by a former RVA staff member or volunteer, and that this individual is currently employed with another organization and has access to children, RVA will normally inform that organization of the confirmed offense(s) and report to authorities as required, while seeking legal counsel.

Member Care

The Response Team will seek opportunities to provide individual help and care for the child and his/her family, the respondent and his/her family, and other individuals affected during and after a child safety response. RVA will provide support to affected individuals according to the resources available to the school. Member care services will be recommended on a case-by-case basis and may include, but are not limited to: medical care, assigned school advocate, counseling, mentoring, chaplaincy support, compassionate leave, and/or additional information and resources.

Historical Reports

RVA is committed to taking all reports of harm to children seriously, whether past or present. Because of the importance to the individual, other children, and the organization itself, RVA will respond to reports of abuse, no matter how old. In such historical cases, i.e., more than three years after the abuse occurred and where the victim is now an adult, the following factors shall be necessary to initiate a formal response: the willingness of the individual to make a formal report, or an eye witness account of abuse by a third party. A sexual abuse offender's relationship with RVA should be terminated if the allegations are confirmed, regardless of any statute of limitations.

Media Relations

It is the responsibility of the Superintendent to be the designated spokesperson to speak on behalf of RVA to media and to the public in relation to a child safety response. All inquiries should be directed to the Superintendent. Comments should not be made by other individuals unless given permission to do so. Public statements must be well prepared and presented under the guidance of legal counsel. At no time should board members or staff engage in denial, minimization, or blame, or admit responsibility which could prejudice the case or cause increased liability to RVA.

Reporting & Response Guidelines

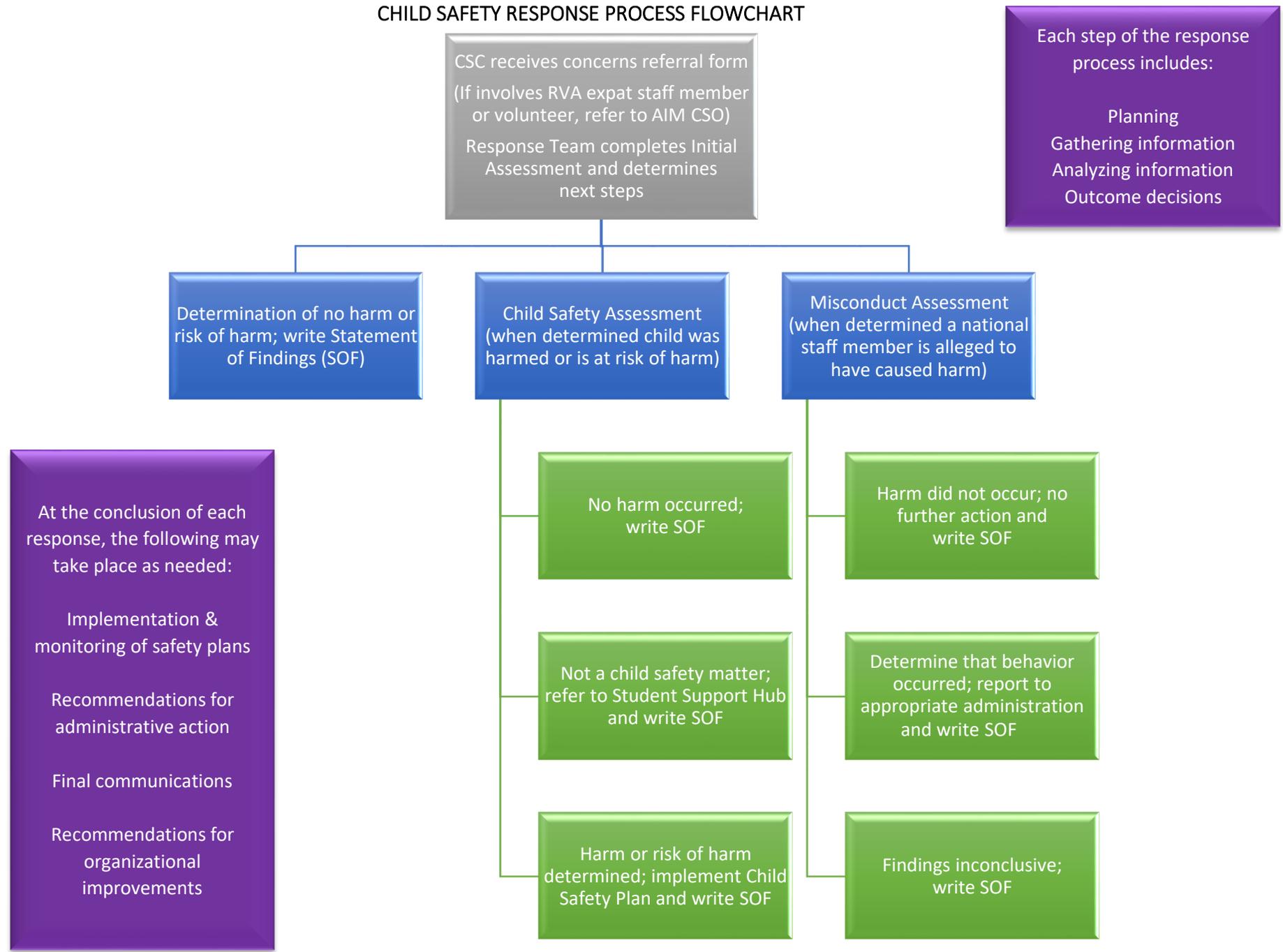
(Examples of what and where to report)

Level 1	Level 2	Level 3
<ul style="list-style-type: none"> •Lying •Cheating •Personal misuse of technology •Inappropriate language •Disrespect •Gossip/slander •Mocking/teasing •Disobedience 	<ul style="list-style-type: none"> •Consensual sexual activity between peers* older than sixteen years of age •Bullying/fighting between peers •Discrimination •Harassment •Threatening or violent behavior that is not defined as physically abusive •Possession of weapons •Gang activity •Possession or use of tobacco, alcohol, drugs, or pornography •Serious or repeated behavior that violates school behavioral expectations • Inappropriate behavior by staff towards students •Depression, eating disorders, self harm, and suicidal expressions or indicators (report to hubcoordinator@rva.org or call 0796 114 525 in the event of an emergency) 	<ul style="list-style-type: none"> •Threatening or bullying younger or weaker students, or a pattern of bullying behavior •Sexual harassment between peers •Abuse (physical, sexual, or emotional abuse, neglect, or exploitation) •Inappropriate behavior between adults and students •Inappropriate physical, sexual, or emotional relationship between an adult and student •Abuse/harassment by staff toward students •Non consensual, exploitative, or concerning sexual activity between students or any sexual activity between students younger than sixteen years of age •Possession or distribution of child pornography •Abusive or inappropriate social media communication between students •Sexual play between children

*A peer relationship exists when there is not a significant difference in responsibility, trust, power, age, development, awareness, and/or understanding between the individuals.

<p>Level 1</p> <ul style="list-style-type: none"> -Behavior is corrected and disciplined by the teacher, dorm parent, activity advisor, or appropriate administrator or supervisor -Resolved by RVA staff member and reported to administration if needed -Behavior should be documented for potential follow up 	<p>Level 2</p> <ul style="list-style-type: none"> -Repeated or serious behavior that warrants discipline and/or counseling -Reported to and resolved by an administrator and/or counselor -Behavior should be documented by administrator or counseling as appropriate 	<p>Level 3</p> <ul style="list-style-type: none"> -This type of behavior initiates a child safety response -Reported to and resolved through the Child Safety Coordinator and Response Team -Child safety response is documented
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CHILD SAFETY RESPONSE PROCESS FLOWCHART



Each step of the response process includes:

- Planning
- Gathering information
- Analyzing information
- Outcome decisions

At the conclusion of each response, the following may take place as needed:

- Implementation & monitoring of safety plans
- Recommendations for administrative action
- Final communications
- Recommendations for organizational improvements