

1. PREAMBLE

This document is the overarching Child Protection policy for the Savannah Education Trust school network. It outlines:

- *The aims of the policy*
- *Who is covered by the policy*
- *Our commitment to keeping children safe and how we will uphold these values and principles*
- *The code of conduct, summarising the expectations of teachers, staff and associates*
- *Reporting procedures*

The appendices contain supporting documents and forms, including:

- *Attestation of Commitment to the SET Child Protection Policy*
- *Reporting guidelines and reporting form*

In addition, each teacher and worker in a SET school is given a letter outlining the expectations of the Board of Trustees with regard to Child Protection mindsets, behaviours and procedures.

¹ Reviewed and approved by SET Board of Trustees, February 2024; next review date, February 2026.

Savannah Education Trust Child Protection Policy²

2. INTRODUCTION

Children have the right to protection from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse³. As a Christian, child-centred organisation, Savannah Education Trust⁴ has a commitment to promoting the rights of all children⁵.

This policy sets out the common values and principles of Child Protection held by SET and describes the rules that SET staff⁶ and associates⁷ must abide by, and steps that will be taken to meet our commitment to protect children. This policy extends to students at SET schools, including those who are over the age of 18 whilst enrolled.

Our top priority at Savannah Education Trust is the spiritual, mental, physical and emotional wellbeing of our students. SET expects that all of its employees and associates have the child's best interests at the heart of their involvement with SET. This policy applies to everyone working for or associated with SET, and covers all areas of safeguarding, including bullying and harassment, corporal punishment and sexual abuse, whether verbal, physical, online or via phone.

3. OUR COMMITMENT TO KEEPING CHILDREN SAFE

Our Child Protection principles:

- All children have equal rights to be safe and to be protected from abuse.
- All children have an equal right to fulfil their potential.
- SET will not discriminate against any child and will challenge any inequality.

² The SET Child Protection Policy draws from 2018 SET Global Child Protection Policy and the PEAS Child Protection Policy 2022, based on the Child Protection Policies of Plan International, Save the Children and the Keeping Children Safe Coalition.

³ These terms are defined in Appendix 4

⁴ Abbreviated within this document to SET

⁵ A child is defined as any person under the age of 18 years. However, the policy extends to students of all SET Schools, including those who are over the age of 18 whilst enrolled.

⁶ SET staff refers to anyone working for SET or in one of the SET schools. SET schools are government schools and teachers are employed by the Ghana Education Service (GES). However, for the procedural and legal requirements of this policy, SET staff includes teachers.

⁷ An 'associate' of SET is defined as anyone who is contractually working with or for SET, including in a voluntary capacity. This includes but is not exclusive to media, donors, board members, partner organisations, contractors, consultants or anyone brought into contact with children or child-sensitive data whilst working for/ with or visiting SET.

- SET has a commitment to protecting children with/for whom we work.
- SET will be guided by the principle of 'the best interests of the child'.
- Child abuse is never acceptable.
- Everybody has a responsibility to support the protection of children.

OUR STATEMENT OF COMMITMENT TO KEEPING CHILDREN SAFE

SET is committed to keeping children safe from harm and ensuring that children's rights to protection are fully realised. We take very seriously our responsibility to promote child-safe practices and protect children from harm, abuse, neglect and exploitation in any form.

Our decisions and actions in response to child protection concerns will be guided by the principle of 'the best interests of the child'.

SET expects a zero-tolerance mindset to any form of child maltreatment.

How we will uphold these values and principles:

SET will protect children from abuse through the following means:

- **Awareness:** We will ensure that all SET staff and associates are aware of the need to keep children safe and the problem of child abuse.
- **Prevention:** We will ensure that all staff and associates minimise risks to children through awareness and good practice.
- **Reporting:** We will ensure that all staff understand the procedure to follow when concerns arise regarding the safety of children.⁸
- **Responding:** We will ensure that action is taken to keep children safe where concerns arise regarding possible abuse.

SET is committed to looking for ways to strengthen our approach and we regularly invest in high quality training to help staff become more effective in their roles.

How we will ensure that our commitments are met:

- All SET employees, teachers, and anyone who comes into unsupervised contact with children will sign up to and abide by the Child Protection policy and SET Code of Conduct (Appendix 1)

⁸ If a legitimate concern about suspected child abuse is raised, which proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in the cases of false and malicious accusations of child abuse.

- The SET Child Protection policy will be available and accessible to all SET staff, associates and students
- Recruitment procedures will include checks on suitability of working with children
- All SET staff will learn about the Child Protection policy, procedures and issues as part of their induction
- All SET students will learn how to identify child abuse, to understand the rights of the child and to report any concerns
- All SET staff, who come into contact with children, will be trained in the relevant procedures for preventing, reporting and responding to possible child abuse

4. CHILD PROTECTION POLICY - STAKEHOLDERS

The Child Protection Policy applies to everyone working for SET, at a SET school and anyone who has contact with the school/children. This includes, but is not limited to:

1. SET school staff at all levels: headteachers, teachers, administration staff, guards, cleaners, cooks and all other permanent and support staff employed at the school.
2. SET staff at all levels: anyone working for SET, including those who do not come into direct contact with children such as office staff.
3. Associates: all persons who are associated with SET, such as volunteers, PTA members, suppliers, evaluators, contract workers, partners, and all government officials who work with SET.
4. Community Stakeholders: the community stakeholders include the local chief, Pognaa, the assembly personnel, opinion leaders, community members, and all SMC members and PTA executives of the SET school.
5. Visitors⁹: all visitors to the school, such as SET staff who do not work in the school, trustees, parents, journalists, photographers, supporters, donors and other visitors that may go to the school¹⁰.

5. CHILD PROTECTION POLICY - Code of Conduct

It is important for all SET staff and associates in contact with children to:

⁹ Visitors to schools should always be accompanied by a member of SET staff/ an associate who has signed the policy. If visits are regular (e.g. a weekly visit for a term by an outside agency) or for a sustained period (e.g. a UK volunteer teaching in one of the schools), then the individual should read and sign the policy as an associate.

¹⁰ There are no UK staff working in Ghana and no plans for this situation to change. We require, however, that any visitors from outside of Ghana wanting to visit the schools undergo a DBS check (or equivalent).

- Take safeguarding and child protection concerns with the utmost seriousness and act on concerns quickly according to SET procedures
- Be aware of situations that may present risks to children, and manage these
- Plan and organise the work and the workplace so as to minimise risks to children
- As far as possible, be visible to others when working with children
- Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- Talk to children about their contact with staff or others and encourage them to raise any concerns
- Take all Child Protection allegations, reports or concerns seriously
- Empower children - discuss their rights, what is acceptable and unacceptable, and what they can do if there is a problem
- Display high standards of behaviour at all times, providing a positive role model for young people

In general, it is inappropriate to:

- Spend excessive time alone with a child/children with whom you are working away from others
- Take a child/children with whom you are working to your home, especially where they will be alone with you.

SET staff and associates must never:

- Hit or otherwise physically assault or physically abuse children
- Develop physical/sexual relationships with children
- Develop relationships with children which could in any way be deemed exploitative or abusive
- Act in ways that may be abusive or may place a child at risk of abuse
- Use computers, mobile phones, or video/digital cameras or other electronic devices, to access, view, create, download, or distribute pornography, especially abusive images of children or young people.

SET staff and associates must avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:

- Use language, make suggestions or offer advice that is inappropriate, offensive or abusive.
- Behave physically in a manner that is inappropriate or sexually provocative.

- Have a child/children with whom they are working to stay overnight at their home.
- Sleep in the same room or bed as a child with whom they are working.
- Do things for children of a personal nature that they can do for themselves.
- Condone, or participate in, behaviour of children that is illegal, unsafe or abusive.
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Discriminate against, show differential treatment, or favour particular children to the exclusion of others
- Engage in sexual relationships with any student (including those who are aged 18 or over)
- Use any computers, mobile phones, video and digital camera or any such medium to exploit, harass or bully children or young people.

The above is not an exhaustive list. Teachers, staff, associates and visitors should consider all related actions and behaviour which may compromise the rights and safeguarding of children and young people.

Personal conduct outside of work

More broadly, SET is committed to ensuring that SET teachers and employees apply high standards of behaviour towards children within both their professional and private lives. The ability of SET to achieve its aims is linked to its reputation. Members of SET staff and teachers are perceived as representatives both inside and outside working hours. All SET staff and teachers are, therefore, responsible for upholding the SET Child Protection policy both within and beyond their work.

Any SET staff member who contravenes the above will be subject to SET disciplinary action. Any SET associate who contravenes the above will risk sanctions up to and including the termination of all relations including contractual and partnership agreements with SET.

6. CHILD PROTECTION POLICY – COMMUNITY STAKEHOLDERS

6.1 Engagement with Community Stakeholders

The welfare of children and young people is a shared responsibility that extends beyond the school environment. Recognising that children are first and foremost members of their local communities, SET is committed to collaborating with community stakeholders to ensure effective child protection and safeguarding standards.

Key stakeholders within the local community, including local chiefs, opinion leaders, and members of the School Management Committee (SMC) and Parent Teacher Association (PTA), play a crucial role in supporting and strengthening child protection systems. Their involvement is critical in creating a safe and nurturing environment for children and young people to grow and thrive.

6.2 Commitment to Collaboration

SET is dedicated to working closely with local community stakeholders. By consulting and collaborating with them, SET aims to extend child protection efforts beyond the confines of the school environment and into the wider community. This approach will support the development of comprehensive safeguarding measures to effectively address the needs of children and young people.

6.3 Engagement Strategies

To achieve this collaboration, SET will:

1. **Facilitate Community Dialogues:** Organise and/or participate in meetings such as SMC/PTA meetings, School Performance Appraisal Meetings (SPAM), and community events like durbars. These forums will serve as opportunities to engage with community members, share knowledge about child rights and protection laws, and discuss effective safeguarding practices.
2. **Provide Education and Training:** Equip community members with essential knowledge on child rights, protections, and safeguarding practices. This education will empower community stakeholders to recognise, prevent, and respond to child protection concerns effectively.
3. **Establish Feedback Channels:** Create and maintain feedback channels to receive valuable input from local authorities and community members. Regular updates on the progress of safeguarding concerns will be provided to ensure transparency and ongoing community involvement and buy-in.

7. REPORTING AND RESPONDING TO CHILD PROTECTION CONCERNS

Every member of SET staff must report all Child Protection allegations, reports or concerns according to reporting procedures laid out in Appendix 2, 3 and 4 of this document. Delays and failure to report immediately or withhold information will be subject to SET disciplinary action.

All reported cases should be taken seriously, and an investigation led locally (see Appendix 1 and 2). Any action taken in response to the alleged abuse must be based on the best interests of the child. The child's views must be taken into account with

respect to further action on the alleged abuse and they must be provided with the information required to make an informed decision on this. The objective of any response made by SET must be to protect the child from further harm and to support them both academically and emotionally.

Attestation of Commitment to the SET Child Protection Policy

I, _____(name),
have read and agree to abide by the contents of SET's Child
Protection policy, including the 'Code of Conduct' (section 4).

Name: _____

Signed: _____

Date: _____

Supervisor/Manager Name:

Signed:

Date:

APPENDIX 1: CATEGORISING INCIDENTS, LEVELS MATRIX

The YAR (yellow-amber-red) Levels Matrix allows anyone reporting a Child Protection incident to identify its severity and take appropriate action:

Level	Description	Example	Report to
Y	Individual incidents which schools are able to respond to and resolve without support. Incidents that take place outside of schools that the school does not have control over but is required to report to local authorities.	Bullying Escapism Absenteeism Evidence of corporal punishment at students' homes	Head Teacher and/or Child Protection Focal Person
A	Incidents which schools need SETs support to respond to, either because they affect multiple students, involve a complex set of stakeholders, or may have an impact on the school's reputation.	Evidence of pestering behaviour from community members towards students on their way to and from school A lack of discipline in school leading to bullying of multiple students Staff member reported as being too strict on students	Head Teacher and/or Child Protection Focal Person SET School Improvement Officer* and SET Country Manager within 24 hrs
R	Incidents involving criminal activity, or physical or sexual abuse perpetrated by staff or students. This type of incident would have an impact on SETs reputation in Ghana and the UK	One-off case of sexual abuse by staff member Sexual relationship between two students Use of corporal punishment Organised student rebellion or strike.	Head Teacher and/or Child Protection Focal Person SET Country Manager and SET School Improvement Officer* within 24 hours (and on to UK). Police in cases involving criminal activity
	Major incidents that have potentially life-threatening consequences for students. Widespread incidents that involve abuse or criminal activity impacting multiple students.	Repeated sexual abuse by single perpetrator Widespread use of corporal punishment Any abuse involving school leaders or where school leaders are aware and have not reported. Disease epidemic.	
	Serious incidents that could have an immediate impact on SET operations/reputation and/or could have been prevented through proper compliance with SETs policies and guidelines.	Death of a student due to infrastructure collapse Widespread sexual abuse (particularly if there has been a deliberate or negligent failure to report)	

* School Improvement Officer reports to Country Manager

APPENDIX 2: CHILD PROTECTION REPORTING PROCEDURE

1. When to report

Remember...safeguarding is everyone's responsibility. Any allegation or suspicion of a Child Protection incident should be taken seriously by members of staff, including anonymous disclosures.

Every individual who comes into contact with a child under SET protection is responsible for immediately reporting a Child Protection concern if they discover one, or even have unconfirmed suspicions. This concern could occur in a number of ways, including but not limited to:

- A child openly confiding in that individual about a form of child abuse that they have been victim of, witnessed, or heard about.
- Witnessing an exchange of an unusual and/or suspicious nature between a child and another child or an adult.
- Witnessing a situation that might put a child's safety at risk.
- Noticing evidence of mental abuse or trauma of a child, such as a child behaving in a way that is not usual for them or which demonstrates that they are openly frightened.
- Noticing evidence of physical abuse of a child, such as a visible injury.
- Any suspicion that a child is injured, marked or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any behaviours which give rise to suspicions that a child may have suffered harm.
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns that a child is presenting signs or symptoms of abuse or neglect.
- Any significant changes in a child's presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.

2. How to make a report

Step 1: If the information is gathered directly from a child, provide a safe and friendly place to talk

- Ensure that the conversation takes place in a friendly environment where the student is comfortable to speak and where discretion and privacy can be

assured. It is important that the staff member stays calm but takes the disclosure seriously. Listen quietly, carefully and patiently.

- Let the child explain to you in his or her own words what happened, but don't ask leading or open questions. Do not assume anything. You should offer reassurance that they were right to tell someone, and they did nothing wrong and advise them that you will inform the school's designated Child Protection Focal Person [CPFP] (see Appendix 5) and assure them that they will get back to them as soon as possible, with a timeframe.
- Do not promise confidentiality to the child. You must explain that you are required to pass this on, but only to members of staff who will be able to support the child and who will treat the issue with a high level of sensitivity.

Step 2: Record

- Make some very brief notes at the time and write them up in detail as soon as possible. Record the date, time, place, words used by the Child Survivor or Victim (CSV) and how he or she appeared to you – be specific. Record the actual words used, statements and any other observable things such as body language and appearance, not your interpretations or assumptions- keep it factual.

Step 3: Establish the level of incident

- Based on the information gathered in these initial interactions, classify the incident using the yellow/amber/red Level Matrix in Appendix 1. If necessary, report to the SET Office and to the authorities, if appropriate.

Step 4: Gather More Information

- The process outlined in Appendix 1 and 2 should be followed
- For yellow level incidents, the Head teacher should collect more information from other people that witnessed the violence or who knew about the abuse. An investigation, led by the school leadership team and the SET School Improvement Officer and Country Manager, is to take place where the confidentiality of all parties involved is respected as appropriate.

APPENDIX 3: CHILD PROTECTION REPORTING FORM

Instructions for completing the form

- Use this form to report concerns in accordance with SETs Child Protection Policy
- Attempt to fill in as much of the form as possible.
- Leave blank those areas for which you have no knowledge.
- Distinguish between what you know/observed personally and what was told you by someone else
- If more space is necessary, use additional paper and attach to this form
- The information in this form is confidential. It should only be shared with those people who need to know (see Appendix 1).
- Head teachers should photocopy this form and have a supply available in the staff office

- Use this form to report concerns in accordance with SETs Child Protection Policy
- Attempt to fill in as much of the form as possible.
- Leave blank those areas for which you have no knowledge.
- Distinguish between what you know/observed personally and what was told you by someone else
- If more space is necessary, use additional paper and attach to this form
- The information in this form is confidential. It should only be shared with those people who need to know (see Appendix 1).
- Head teachers should photocopy this form and have a supply available in the staff office

PART 1 - Details of incident/concern

No. of victims involved? (provide names, please specify if adult or child)			
Date incident took place? (n/a if a general concern)			
Location of incident?			
Who reported the concern? (name and role)			
How was the concern/incident reported?			
Has the incident been reported to the relevant authorities? If so, confirm date.			
Description of victim(s) wellbeing?			
What happened? Please provide as much detail as possible about the incident/concern			
What immediate actions have been taken?			
Part 1 Completed by:	Role/Title:	School	Date:

PART 2 - Follow up, outcome, corrective action and lessons learned	
What steps have been taken to protect the alleged victim (adult or child)?	
What steps have been taken to investigate the concern? How was the investigation conducted? Who was consulted?	
If appropriate, what steps have been taken to discipline the perpetrator?	
What was the outcome of your investigation? Include any follow up actions taken - by the school, SET Office and/ or UK trustees	
What have you learnt from this incident? Include policy and procedures	

Part 2 Completed by:	Role/Title:	School	Date:

APPENDIX 4: Definitions of safeguarding and types of abuse

Safeguarding: 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 grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse: for the purposes of this policy, abuse is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical (e.g. via the internet) as well as the impact of witnessing the ill treatment of others.

Physical violence and abuse: for the purposes of this policy, physical abuse is defined as a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Mental or emotional abuse: for the purposes of this policy emotional abuse is defined as the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate or valued in comparison to another person, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say and how they communicate. It may involve serious bullying, causing the child 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, but it may also occur alone.

Sexual abuse: for the purposes of this policy, sexual abuse is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images,

encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

Sexual harassment: refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual abuse and/or sexual violence. Sexual harassment can include but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual 'jokes' and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment

APPENDIX 5: The Child Protection Focal Points

Each school has a designated Child Protection Focal Point (CPFP). The role of the CPFP is to:

- Support the Headteacher in developing a safe environment for pupils to learn. This includes providing sustained focus with regard to awareness, prevention, reporting and responding.
- Assist in Child Protection/Safeguarding training and disseminating this training in their designated school.
- Support, mentor, coach and instruct children by setting a good example
- Assist in conducting disciplinary proceedings in cases of offenses committed by staff members and students.
- Give children in their custody advice, guidance and counsel, companionship and understanding
- Represent them in all matters affecting their interests.
- Inculcate the value of respect and obedience.
- Be able to support children in life skill training, guide and counsel children that encounter cases of abuse,
- Maintain a record of all abuse incidents and proceedings.
- Report cases of abuse to the Head teacher and ensure that procedures outlined in this policy are adhered to.
- Support Head teacher and SMC to engage community members on safeguarding concerns.