



# CHARTERHOUSE LAGOS

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## Part 1: Introduction, Key Principles and Definitions

### Introduction

Keeping our students safe is the responsibility of every adult who works at or visits Charterhouse Lagos

The purpose of this policy is to:

1. Protect children who attend Charterhouse Lagos
2. Provide all adults (staff, parents, and volunteers) with overarching principles that guide approaches to safeguarding and child protection.

All staff at Charterhouse Lagos are appointed following the school's safer recruitment procedures. They are required to read the Safeguarding, Managing Allegations about an Adult and Low-Level Concerns policies, complete the school's essential safeguarding training and sign the Staff Code of Conduct (see policy) and the Safeguarding Code of Conduct (Appendix A) before being allowed to work with children. Failure to comply with these policies and codes will be addressed without delay and may ultimately result in disciplinary action.

All regular, unsupervised volunteers are required to complete the appropriate school's essential safeguarding training, sign the school's Safeguarding Code of Conduct (see Appendix A) as well as meet the requirements for unsupervised volunteers set out in the school's safer recruitment policy before being allowed to work with children. Failure to comply with the policy will be addressed without delay and may result in the termination of voluntary work at the school.

People who live in staff residential buildings who are not directly employed by Charterhouse Lagos, namely spouses, partners, nannies and children (over the age of 16) are considered unsupervised volunteers due to their access to the campus. They must meet the requirements as set out by the school's safer recruitment policy. They are also required to read and sign the Household Members, Visitors and Guests Policy.

Other volunteers who help on an occasional basis and work under the direct supervision of a member of staff sign the volunteer Safeguarding Statement and should not be left unsupervised with students at any time. (see Appendix B).

The school provides all visitors or guests with a Safeguarding Statement before entering the school campus (Appendix C). All visitors must read the Safeguarding Statement before being issued a visitor or guest pass and must be always supervised on the school campus.

Charterhouse Lagos acknowledges the duty of care to safeguard and promote the welfare of children. It is committed to ensuring safeguarding practice reflects statutory

responsibilities and requirements, government guidance, and internationally recognised best practice. Chief among these are:

1. Lagos State Safeguarding and Child Protection Policy (Government of Lagos State, December 2016)
2. EO/BRF/005OF2014, Lagos State Sex Offenders Monitoring Programme and Mandated Reporting, 2014
3. The Family Court of Lagos State (Civil Procedure) Rules 2012
4. Criminal Law of Lagos State 2011
5. Lagos State Child's Rights Law, 2007
6. Prevention Against Domestic Violence Law, 2007
7. Child's Rights Act, 2003
8. African Charter on the Rights and Welfare of the Child, 1999
9. National Minimum Standards for Boarding Schools, 2022
10. Keeping Children Safe in Education (UK Department of Education, September 2023)
11. United Nations Convention on the Rights of the Child (<https://www.unicef.org/child-rights-convention>)

The United Nations' Convention on the Rights of the Child is an international agreement on childhood. The Federal Republic of Nigeria signed the treaty in 1991.

The school's external child protection context and resources document provides further information regarding legislation and laws related to safeguarding and child protection within Lagos State and Nigeria (see Appendix D).

Key safeguarding roles and responsibilities are listed in Appendix E. Photos of key personal and their contact details are displayed around the school and can also be found on the School's SharePoint Site.

The Safeguarding Review Committee is made up of representatives from each area of the school, including the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, the Child Protection Officer(s), Deputy Child Protection Officer(s), Head of Boarding, School Counsellor(s), E-Safety Lead and the Lead Trainer. The Designated Safeguarding Lead is the chair of this committee and reports directly to the Head. The role of the Safeguarding Review Committee is to:

- Monitor safeguarding practices within the school.
- Develop an action plan encompassing operational practices and strategic development relating to the annual audit.
- Oversee professional learning and development with regards to safeguarding
- Participate in the review of the Safeguarding Policy and Safeguarding Code of Conduct, plus associated documents and materials, on an annual basis considering: Any changes in legislation and / or government guidance, Any other significant changes or events.

## 1.1 Key Principles and Competencies

### Key Principles

- Everyone is responsible for keeping our students safe.
- All adults working at the school are trained.
- The need of every individual student is supported, and we recognise that some students are more vulnerable than others.
- Safeguarding is proactively delivered through the school curriculum.
- We always use safer recruitment procedures.
- Safe reporting is a key aspect of our school culture.

### Competencies (Adults)

We ensure that every staff member, volunteer and adult resident at Charterhouse Lagos will meet the following competencies.

- Place students at the centre of everything that you do
- Understand the possible signs and indicators for abuse and neglect.
- Know how to appropriately communicate with and respond to students.
- Always focus on safeguarding needs and respect the need for confidentiality.
- Understand what may make some children more vulnerable.
- Understand the Safeguarding Policy, supporting policies and the Safeguarding Code of Conduct
- Know how to share information safely, and who to share it with
- Be culturally sensitive.

### Competencies (Students)

Our Speak Out, Stay Safe Programme is designed to encourage students to report when they have been abused, neglected, or made to feel uncomfortable by adults or peers in school or outside. This includes risks posed via the internet, and social media. Further information can be found in the school's curriculum document and e-safety policy.

Additional Specific Speak Out, Stay Safe provision for boarders is provided in the following ways:

- During the boarder induction programme, boarders are provided with information about how to contact staff outside of the school day.
- A phone is accessible to boarders at all times so they can contact a local child specific support service.

**Safeguarding:** Safeguarding is proactively protecting our children in every aspect of their emotional, intellectual, physical and moral development and welfare.

**Child protection:** Child protection is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm because of abuse or

neglect. It involves measures and structures designed to prevent and respond to abuse and neglect.

### **Other Definitions**

**Child:** Any person under 18 years as provided by the Child's Rights Law 2007 Laws of Lagos State of Nigeria

**Disclosure:** Information given to a staff member by a child, parent or caregiver or a third party in relation to abuse or neglect.

**Significant Harm:** Significant harm relates to the severity of maltreatment, the degree, extent, duration and frequency of abuse and neglect; the extent of premeditation, presence or degree of threat, coercion, sadism and bizarre or unusual elements.

## **Part 2: Concerns About a Child**

### **2.1 Forms of Child Abuse**

Abuse is any form of intentional harm by an adult or another child.

All members of staff need to understand the possible signs and indicators for abuse and neglect as a key competency. Recognizing any potential sign of abuse does not automatically mean a child has been abused but should alert adults to the possibility.

Detailed information and indicators on the four main types of abuse (physical, sexual, emotional, neglect), can be found in Appendix F.

Staff should be aware that a greater risk of abuse or neglect is faced by children who come from chaotic home backgrounds or might be discriminated against on the grounds of sex, ethnicity or sexual orientation. Children who are disabled, have special educational needs or certain medical conditions, are particularly vulnerable to abuse.

All adults working or volunteering at the school must also be aware of child-on-child abuse which are ways students can be harmful to each other. Bullying is an example of this and the school's approach is outlined in the school's anti-bullying policy.

Further information related to the prevention, early identification and appropriate management of child-on-child abuse can be found in the school's child-on-child abuse policy. This policy includes information about harmful sexual behaviours, sexual abuse, sexual violence, sexual harassment, Youth Produced Imagery, and Initiation/hazing.

### **2.2 Specific Safeguarding and Child Protection Issues**

In addition to the four forms of abuse, there are specific types and issues that people working in schools should be aware of. These include family and community abuse, honour based/forced marriage, female genital mutilation, extra-familial harm, serious violence, gang and child criminal exploitation and radicalisation. Detailed information on these specific types of safeguarding and issues can be found in Appendix G.

## Part 3: Procedures: The Management of Reports

### 3.1 Disclosures

When a child discloses, the way an adult reacts is crucial. A staff member should offer the child a safe context in which to speak and reassure them that they will be taken seriously. Children should never be told to go away and speak to someone else.

The adult should listen calmly and carefully to whatever the child has to say. The adult should allow the child to speak freely without interruption and should not be judgemental by reacting with strong emotions. The adult can seek clarification of facts but should not ask leading questions. It is best practice not to write notes while the child is speaking but rather make a written record directly afterwards.

### 3.2 Reporting Concerns

If there is a danger to life, a risk of serious injury, a crime is in progress or about to happen on Charterhouse Lagos' campus, members of staff should contact the duty Security officer in the first instance. Contact with the police should only be made through official school channels.

Charterhouse Lagos has a digital reporting platform to report safeguarding and child protection concerns. All members of staff and volunteers are provided with regular training on reporting concerns.

In the event a member of staff or volunteer can't access to the school's digital reporting platform, the Record of Concern Form can be used (see Appendix HI). Copies of these forms can be found in the following areas: All campus reception areas and Staff Club.

It is the responsibility of the appropriate Child Protection Officer to scan and upload a RoC form to the school's digital reporting platform following a report from an adult once received. The RoC form should then be securely disposed of.

All members of staff or volunteers should report any concerns they have about a child to the appropriate Child Protection Officer (CPO) immediately. At the time of reporting to the Child Protection Officer, the adult will be asked to write a record on the school's digital reporting platform of what has been said or seen – if this has not already been done. At no time, should a record on the school's digital reporting platform be a replacement for a face-to-face conversation. The reporting procedures that should be followed are outlined in Appendix H.

If a concern is raised related to a boarder, the appropriate Child Protection Officer (CPO) will ensure relevant information is communicated with the Head of Boarding.

The recognizes that children in boarding environments may be more likely to disclose potential safeguarding issues to a member of the boarding team. A boarding context also increases the potential child-on-child abuse, as do environments with a significant gender imbalance.

**Out of Term-Time Reporting:** when children are on the campus out of term-time (for example, summer camps), arrangements are made with the DSL Team and/or Boarding staff leaders to ensure the presence of someone qualified to take a lead in safeguarding matters.

Concerns are defined in two categories:

**Safeguarding Concerns:** where the child is potentially vulnerable, but not at significant or immediate risk of harm.

When a safeguarding concern arises, the Child Protection Officer may consult with the Designated Safeguarding Lead, to ensure that the appropriate strategy is agreed and implemented.

All relevant information relating to observations and actions will be recorded on the school's digital reporting platform.

**Child Protection Concerns:** where the child is at significant or immediate risk of harm. Upon receipt of a Child Protection Concern, the Child Protection Officer will inform the Designated Safeguarding Lead and the Head, and appropriate action is taken.

In all serious child protection incidents, the Director of Education, must be informed. In his/her absence, the Board's Designated Safeguarding Lead should be contacted.

A response team may be formed to assess a reported child protection. Participants chosen will depend upon the nature of the situation. The team will take a holistic approach, addressing the student's needs within the family, the school, the wider community and the local or international context. Involvement of the school counsellor must be considered but is not automatic.

The school must follow local laws and regulations concerning the reports of abuse under which the physical and mental health of a minor is seriously harmed. Should a receipt of a Child Protection Concern lead to a reporting obligation, guidance will be sought from the Director of Education who may consult with a member of Charterhouse Lagos' legal team.

The school uses local, national or international sources of support for identified child protection concerns (see Appendix D). Contacts may also be used to support children and their families when early signs of any challenges to a child's safety or wellbeing are evident.

### **3.4 Confidentiality**

The school will ensure all data related to students is confidentially managed in accordance with local, national laws/regulations and international standards.

Any member of staff who has reason to believe that a child is vulnerable or in immediate or significant risk of harm, must pass on this information via the school's reporting



procedures. Confidentiality should never be a barrier to sharing information for the purpose of keeping children safe.

Strict confidentiality must be maintained however regarding the reporting of Safeguarding and Child Protection issues. These matters should not be discussed with other staff members or other members of the wider community.

### **3.5 Self-reporting**

Staff should raise with the appropriate Child Protection Officer any personal difficulties which may impact their professional behaviour. This includes any situation in which their professional competency has been compromised.

Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children in the school. Where appropriate professional and personal support will be offered.

Staff or volunteers should also seek advice or self-report if they feel compromised as a parent of the school in any aspect of safeguarding.

Cases of self-reporting will be recorded on the school's digital reporting system.

### **3.6 Safe Touch**

On a rare occasion, a staff member may have to make a physical intervention to a child that is not expected. Members of staff should only do this:

- a. where action is necessary in self-defence or because there is an imminent risk of injury
- b. where there is a developing risk of injury, or significant damage to property.

Examples of such situations are:

- A child attacks a member of staff, or another child.
- Children are fighting.
- A child is causing, or at risk of causing, injury, or damage by accident, by rough play, or by misuse of dangerous materials, substances, or objects.
- A child is or appears to be under the influence of alcohol or illegal substances.
- A child absconds from school. This will only apply if a child would be at serious risk if not kept in school.

Physical intervention can take several forms. It might involve staff:

- Physically interposing between children.
- Blocking a child's path.
- Leading a child by the arm.
- Shepherding a child away by placing a hand in the centre of the back.

- In extreme circumstances, using more restrictive holds, including holding, pushing, and pulling.

This school's safe touch and reasonable force policies address safe touch in areas such as PE, music, dance, drama, outdoor education, etc where adults may need to touch children as a normal part of their duties to help with posture or positioning as well as guidance regarding a physical intervention.

### **3.4 Record Keeping**

The record of any concerns raised, decisions made, and actions taken about the safety or welfare of a child are recorded on the school's digital reporting platform. Files are kept for 25 years from the child's date of birth.

All file documentation relating to concerns about an adult (any person over 18 years old) will be kept indefinitely.

If a parent makes a request to access a child's safeguarding file, it should be done in writing in accordance with the school's data protection policy. There may be circumstances in which parents may be refused access to safeguarding files:

- a) it could cause serious harm or is likely to cause serious harm to the physical or mental health of the child or another person.
- b) It could reveal that the student has been subject to, or at risk of child abuse and the disclosure is not in the best interest of the child.
- c) It is likely to prejudice an ongoing criminal investigation.

### **3.5 Transferring Safeguarding Files**

The School's Designated Safeguarding Lead is responsible for keeping files confidentially and securely and for fulfilling the school's duty to pass them on promptly for any child leaving Charterhouse Lagos before the age of 18.

Nigeria's data protection obligations and practices (2023) state that consent from a parent or legal guardian is not required to process data if it's necessary to protect the vital interests of the child. This includes education, medical or social care purposes.

Safeguarding Information should be transferred within the first five days of the start of the new term, or within five days of joining the new school if the child transfers in the middle of a year. If the new educational establishment is in another country, the legal requirements in this country should be checked first.

The appropriate Child Protection Officer should talk directly with the new school's Child Protection Officer or Designated Safeguarding Lead. It is not appropriate to leave information with another member of staff, including members of the school's admissions team.

Digital Transfers via the school's digital reporting platform is the preferred transfer process however the use of Special Delivery ('signed for') can also be used. The school

should not share child protection or safeguarding records with other schools as part of an admissions process unless (a) the child has already been offered and accepted a firm place, or (b) parents have given their written consent for all records can be shared with the new school.

Any transfer processes should be recorded/uploaded on the school's digital reporting platform. This includes safeguarding declarations where confirmation about no records is issued.

Where reasonable enquiries fail to identify a child's new school, or where the child moves into home-schooling, the appropriate Child Protection Officer will record on the school's digital reporting platform that the child's protection file is outstanding, stating the reason if known. If there is a child protection plan in place, the Designated Safeguarding Lead will notify the local Child Protection Agency as appropriate.

#### **Part 4: Concerns and Allegations: Adults**

All adults at Charterhouse Lagos should ensure students are their priority and should express concerns about another adult regardless of how small the concern, any sense of loyalty or fear of retribution.

Allegations or concerns about an adult's conduct are defined in two categories:

The Harm' Threshold: if it is suspected or alleged that anyone working in the school has:

- in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against, or related to, a child.
- behaved towards a child in a way that indicates he or she may pose a risk of harm to children.
- behaved or may have behaved in a way that indicates he or she may not be suitable to work with children.

All allegations that meet 'the harm' threshold must be taken directly to the Head. Any allegation about the Head should be taken directly to the Board's Designated Safeguarding Lead.

When an allegation is made against a staff member or other adult, whether by a student or adult, the procedure for managing allegations about an adult will be following using the school's Managing Allegations about an Adult Policy.

**Low Level Concern:** is questionable professional practices or minor indiscretions, including inappropriate behaviour outside of work by an adult. These indiscretions are inconsistent with the school's Staff Code of Conduct.

A low-level concern could include but is not limited to:

- being over friendly with students
- having favourites

- Taking photographs of students on their mobile phone
- Using inappropriate sexualised, intimidating, or offensive language
- Engaging with students on social media
- engaging with a student on a one-to-one basis in a secluded or behind a closed door

When a low-level concern has been identified, the procedure outlined in Low Level Concern Policy will be followed.

Low-level concerns should be reported to the Designated Safeguarding Lead or Deputy Safeguarding Lead

All adults working at the school are trained to raise allegations and concerns however apparently minor and not to ignore them, cover them up or delay reporting them.

### **Visitors & Guests**

Visitors and guests are defined in two categories:

**Visitors:** refers to any person over the age of 16, who is not staying overnight, that visits the school. All visitors must be supervised throughout their time on the campus.

**Guests:** refers to any person over the age of 16, who is not an adult or student at Charterhouse Lagos, that is staying overnight with staff member residing in the staff residential building. They are a family member (legally recognised) or are a friend of the staff member. Guests must be supervised throughout their time on the campus.

Guests could include professional development providers who stay overnight at the invitation of the School Leadership Team. Such guests must be supervised throughout their time on the campus.

Applications to host a guest or visitor must be made in advance. For further information, please see the Household Members, Visitors and Guests Policy. This policy also includes information about the process if a guest residing with the staff member wishes to become a permanent member of the staff member's household.

## **Part 5: Governance and Management of Safeguarding**

### **5.1 Governance**

The Board has a strategic leadership responsibility for the school's safeguarding arrangements and will ensure that:

- a) It complies with its duties under legislation, and ensures that the policies, procedures, and training at Charterhouse Lagos are effective and always comply with the law. There are appropriate policies and procedures in place to support action being taken in a timely manner to safeguard and promote children's welfare.

- b) One Board Member is appointed to take leadership responsibility for safeguarding and child protection arrangements within the school.
- c) Safeguarding and health and safety are fixed agenda items at all Board meetings.

## 5.2 Management of Safeguarding: Review Cycle

Annual: Charterhouse Lagos has an annual review cycle. The Safeguarding Policy is reviewed annually by the School's Designated Safeguarding Lead working with the Deputy Designated Safeguarding Lead and the Board's Designated Safeguarding Lead. Any changes in the policy must be formally agreed to by the School's Board in accordance with the Project Deed.

Charterhouse Lagos is audited (internally and externally) on a two-year cycle. The internal audit uses a Charterhouse Lagos' auditing protocol (see Appendix J) and is carried out by the Head, Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.

Both internal and external audits are followed by the construction/review of the school's safeguarding action plan (see Appendix K).

**Termly:** The Safeguarding Review Committee reviews the action plan at their termly meetings.

**Monthly:** The Designated Safeguarding Lead reviews safeguarding files with the school's Child Protection Officer/s every month.

**Weekly:** Safeguarding and health and safety are fixed agenda items at every meeting in the school

## 5.3 Management of Safeguarding: Boarding Provision

Charterhouse Lagos recognizes that additional measures must be taken to manage safeguarding risks and protect children from harm within a boarding environment. Measures include providing:

- A homely and welcoming living environment including good quality, clean and well-maintained living accommodation including toilet and washing facilities.
- Guidance to promote positive relationships and behaviour within a boarding environment.
- Good laundry and personal possessions provision.
- Clear guidance related to searching and screening children and their possessions (behaviour policy)
- Food provision to meet dietary needs as well as access to food and drink outside designated mealtimes.
- Access to mental and health services.
- Guidance that respects privacy regarding access to children's boarding rooms.

- Guidance about ways for children to express their thoughts and ideas about the school's boarding provision. This includes speak out, stay safe communication channels.
- Guidance for all new boarders including support systems to make a disclosure and the school's expectations related to physically intimate or sexual relationships.
- Guidance related to device management: access within the boarding environment including monitoring and filtering protocols (e-safety policy)
- Safeguarding information regarding the boarding environment for all staff within safeguarding training sessions.
- Regular specific safeguarding training for all boarding staff.
- Advanced safeguarding training for the Head of Boarding.

Further information about these aspects of boarding provision measures can be found in the school's boarding handbook or the relevant policies as indicated above.

#### **5.4 Management of Safeguarding: Devices and IT Network**

Charterhouse Lagos is committed to ensuring it is a safe digital learning community through a rigorous filtering and monitoring review cycle.

The school's approach focuses on the four 'Cs': content, contact, conduct and commerce as outlined in the Keeping Children Safe in Education Policy (UK Department of Education, September 2023).

Any member of staff who has or is alerted to any child protection concerns related to the use of the internet or social media should follow the lines of communication set out in Appendix I.

The school conducts an annual risk assessment of its' filtering and monitoring processes and these findings form the construction/review of the school's E-Safety action plan. Further information about these procedures can be found in the school's E-safety policy.

#### **5.5 Management of Safeguarding: Safeguarding Training**

The school is committed to giving appropriate training to all adults involved in working with children. The school's Training Matrix can be found in Appendix L.

The school has a Safeguarding Training Team consisting of: A Lead Safeguarding Trainer and an appropriate number of Safeguarding Trainers. All trainers are provided will appropriate training.

#### **5.6 Management of Safeguarding: Safer Recruitment**

To ensure that children are protected while at the school, the school carefully select, screen, train and supervise our staff. Further information can be found in the school's safer recruitment policy outlines the school's approach that focusses on the four steps of: Deter, Reject, Prevent, Detect.

## Safeguarding Policy Links

- Acceptable Use Policy
- Anti-bullying Policy
- Behaviour Policy
- Child-on-Child Abuse Policy
- Educational Visits Policy
- E-Safety Policy
- Emergency Procedures Policy
- First Aid Policy
- Health and Safety Policy
- Household Members, Visitors and Guests Policy
- Low Level Concerns Policy
- Managing Allegations about an Adult Policy
- Safe Touch Policy
- Safer Recruitment Policy
- Staff Code of Conduct Policy
- School Security Policy
- Suicidal Behaviour, Intervention and Response Policy
- Staff Code of Conduct Policy
- Supervision Policy
- Use of Reasonable Force Policy

## Appendices

Appendix A: Safeguarding Code of Conduct

Appendix B: Volunteer Safeguarding Statement

Appendix C: Visitor Safeguarding Statement

Appendix D: External Child Protection Context and Resources

Appendix E: Key Safeguarding Roles and Responsibilities

Appendix F: Information and Indicators: Four Main Types of Abuse

Appendix G: Specific Safeguarding Issues

Appendix H: Record of Concern Form

Appendix I: Safeguarding Lines of Communication

Appendix J: Internal Audit Plan

Appendix K: Safeguarding Action Plan

Appendix L: Training Matrix