



Granada School

Child Protection Policy

Policy Name	Child Protection Policy
School	Granada School
Applies To	Junior School (Grades 7–9), Senior School (Grades 10–12), All Teaching & Non-Teaching Staff (CBC Curriculum)
Approved By	Board / School Leadership
Review Date	September 2026
Next Review Date	September 2027

This policy is available on the public area of the school website and on request from the School Office



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1. Introduction & Core Philosophy

1.1. At Granada School, we believe that every learner in our Junior and Senior School has an absolute right to grow up, learn, and thrive in a safe, nurturing, and secure environment. This single, comprehensive policy governs all safeguarding practices across our campus under the Kenyan Competency-Based Curriculum (CBC/CBE) framework.

1.2. Safeguarding is seamlessly integrated into our educational pathways:

- **CBC/CBE Integration:** Safeguarding principles are explicitly embedded across Junior and Senior School learning areas through Life Skills Education, Values-based Learning, Health Education, and Pertinent and Contemporary Issues (PCIs).

1.3. Statutory Alignment: This policy is built upon the legal foundations of the Republic of Kenya, specifically Article 53 of the Constitution of Kenya 2010, the Children Act 2022, the Sexual Offences Act 2006, and the Basic Education Act 2013.

1.4. Core Safeguarding Principles:

- **The Best Interests of the Child:** This is the primary consideration in all actions, disciplinary measures, pastoral interventions, or structural decisions taken by the school.
- **Equality of Protection:** Non-discrimination is absolute. Every adolescent learner is protected regardless of race, ethnicity, religion, background, or learning path.
- **Absolute Ban on Corporal Punishment:** Under Article 29 of the Kenyan Constitution, corporal punishment is a criminal offense. Granada School maintains a zero-tolerance policy. Any staff member who uses physical force or degrading emotional punishment will face immediate summary dismissal and direct referral to law enforcement and the Teachers Service Commission (TSC).

2. Definitional Framework

- **Safeguarding:** The proactive, systemic measures taken to protect learners from harm, prevent the impairment of their physical, mental, and socio-emotional health, ensure safe and supportive learning conditions, and maximize life outcomes.
- **Child Protection:** The targeted, reactive multi-agency responses designed to protect specific learners who are currently suffering, or are highly likely to suffer, significant harm as a result of abuse, exploitation, or neglect.
- **Abuse:** Any form of physical, sexual, psychological, emotional maltreatment, or neglect that results in actual or potential harm to a child's health, survival, development, or dignity.
- **Child (under Kenyan Law):** Any individual who has not attained the age of 18 years, as per the Children Act 2022.

3. Roles and Institutional Responsibilities

3.1. The Executive Principal

- Holds ultimate operational accountability for the implementation of this safeguarding policy across Junior School and Senior School.
- Ensures that the campus is physically secure and that all third-party services (catering, facility maintenance, transport) comply fully with this policy.
- Protects whistleblowers and ensures an open, safe 'culture of listening' across the school ecosystem.



3.2. Designated Safeguarding Leads (DSLs)

- **Lead DSL (Junior & Senior School):** Manages disclosures, tracking, and student safeguarding files across Grades 7–12, ensuring explicit compliance with the Ministry of Education (MOE) and Sub-County Children's Office regulations.
- **Deputy DSLs:** Strategically deployed across the Junior School (Grades 7–9) and Senior School (Grades 10–12) tiers to ensure swift, on-the-ground response capability.

3.3. All Staff, Contractors, and Volunteers

- Every adult working on campus, including teachers, administrative staff, kitchen crews, school bus drivers, and security personnel—has an equal legal duty to report concerns. The safety and well-being of the learner supersede all administrative or academic divisions.

3.4. The Board of Directors & Nominated Safeguarding Director

- The Board of Directors holds ultimate fiduciary and legal liability for ensuring full systemic compliance with the Children Act 2022.
- A dedicated member of the Board is appointed to serve as the Safeguarding Oversight Director to meet with DSLs termly and oversee an annual safeguarding audit.

4. Contextual Categories of Harm & Abuse

Staff are continuously trained to identify physical, behavioral, and digital signs of distress, with specific emphasis on risks relevant to adolescent learners:

- **Child Sexual Exploitation & Tourism Risks:** Given our regional proximity to coastal tourism hubs, all staff are heavily trained to spot indicators of transactional exploitation, grooming, or inappropriate adult interference.
- **Harmful Cultural Practices:** Absolute zero-tolerance for forced child marriage. If a DSL suspects a learner is at risk of being subjected to this practice (particularly during long school holidays), immediate protective state interventions are triggered.
- **Online Exploitation & CSAM:** In strict adherence to the Computer Misuse and Cybercrimes Act 2018, any digital creation, sharing, or possession of inappropriate or sexual images of minors is treated as a major criminal matter. Campus networks are monitored and filtered.
- **Peer-on-Peer Abuse & Bullying:** Bullying, cyberbullying, sexual harassment, or hazing between learners is handled aggressively through positive discipline and mandatory pastoral intervention.

5. The 5-Step Procedural Response Framework

If any learner makes a disclosure or a staff member notes clear signs of potential abuse, the following sequential procedure must be initiated immediately:

- 1. Receive (Within the Moment):** Listen calmly and without showing shock or judgment. Let the learner speak at their own pace. Never promise absolute secrecy; tell them clearly and gently: 'I am very glad you are telling me this. I will share this with the Safeguarding Lead so we can keep you completely safe.'
- 2. Reassure (Immediate Comfort):** Explicitly tell the learner that they have done the right thing, that they are brave, and that what happened is entirely not their fault. Do not make false promises about what will happen to the perpetrator.
- 3. Respond Objectively (Communication Check):** Do not ask probing, leading, or deep investigative questions. Never demand to know 'Why' something happened. Stick strictly to open-ended, non-leading phrases such as, 'Is there anything else you want to tell me?' Do not carry out a personal investigation.



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4. Record (Within the Same Working Day): Document the conversation immediately using a secure safeguarding form or via your secure digital platform. Write down the child's exact words. Note the date, time, location, and observable physical or emotional signs. Keep your writing strictly objective.

5. Report (Immediate Action Trigger): Hand the written record directly to the Lead DSL within the same working day. If the child is in immediate physical danger, do not let them out of your sight; escort them directly to the DSL or Principal immediately.

5.1 Emergency Medical & Legal Safeguard

If a child discloses recent sexual assault or severe physical trauma:

- Escort the child immediately to the school sanatorium for emergency medical care.
- Preserve Evidence: Staff must not wash the child or photograph any private physical trauma. Forensic integrity must be maintained strictly for law enforcement evaluation under the Sexual Offences Act.

6. Record-Keeping and Data Protection

6.1. Absolute Separation of Files: Safeguarding records are highly sensitive and are never stored inside a student's standard academic or behavioral folder. They are kept on a secure, encrypted digital database accessible exclusively by the Principal and Lead DSLs.

6.2. The 'Need-to-Know' Principle: Details of active cases are strictly protected. General classroom teachers will only be given necessary behavioral guidelines or pastoral support strategies; they will never be given access to graphic details of a child's trauma file.

6.3. Secure Transfer: If a student leaves Granada School to join another institution, their confidential safeguarding history is transmitted directly from Principal to Headteacher via secure channels, entirely separate from the public academic transcript.

7. Statutory Escalation & Key Contacts

If the internal Safeguarding Group (Principal, Lead DSL, Board Representative) determines that a criminal offense against a child has likely occurred, a formal report is submitted to state authorities within 24 hours.

External Protection Resource	Scope of Authority	Emergency Contact Channel
National Child Helpline	Republic of Kenya (Toll-Free, 24/7)	Call 116
Sub-County Children's Officer	Kilifi South / Vipingo Region	Direct Sub-County Registry Desk
Directorate of Criminal Investigations (DCI)	Child Protection Unit / Local Police	Kijipwa Police Station Emergency Desk
Teachers Service Commission (TSC)	National Professional Regulatory Body	County Director for Teacher Misconduct

8. Appendices & Operational Attachments

Appendix 1: Staff Code of Conduct & Safe Working Practices

Every employee, contractor, and volunteer at Granada School must strictly adhere to the following operational boundaries. Violation of these principles constitutes gross misconduct:

- **Physical Contact:** Physical contact with learners must always be public, professional, age-appropriate, and initiated by the learner's emotional needs, never by the adult.
- **Private Spaces:** No adult may be alone with a learner behind closed doors. If a private consultation is required, it must take place in a room with a clear glass viewing window or with another adult present.
- **Digital Communication:** Staff must never communicate with learners via personal social media accounts or personal mobile numbers. All digital interactions must flow through official institutional emails or school-sanctioned digital learning platforms.
- **Transport Guardrails:** School transport drivers and chaperones must never take a single learner on an altered route or drop off a child without verified parental/guardian hand-over.



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Appendix 2: Urgent Child Protection Incident Report Form

This form must be completed objectively and submitted to the Lead DSL within the same working day of a disclosure or incident.

1. GENERAL INFORMATION:

Date: _____ | Time: _____ |

Learner Name: _____

Grade/Level: (Grade 7–12) _____ |

Campus Location: Vipingo Campus

2. NATURE OF CONCERN:

☐ Physical Harm/Abuse

☐ Emotional Distress

☐ Sexual Harassment/Assault

☐ Neglect

☐ Digital Risks/Sexting

☐ Peer-on-Peer Abuse

3. DESCRIPTION: Provide objective, factual details using the learner's exact words. Avoid speculation.

4. INDICATORS: Describe observable physical or emotional signs.

5. REPORTING ADULT:

Name: _____

Role: _____

Signature: _____ | Date: _____



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Appendix 3: External Statutory Contacts & Helplines

- **National Child Protection Center:** Call Toll-Free 116 (Available 24 hours, multi-lingual support).
- **Kilifi County Children's Department Desk:** Located at the Kilifi South Sub-County headquarters.
- **Kijipwa Police Station Gender and Child Protection Desk:** Dedicated officers trained in trauma-informed evidence preservation and minor interviews.
- **Kilifi County Referral Hospital (Malindi/Kilifi Town):** Designated public center for emergency medical-legal examination (P3 Form processing) following critical assaults.

9. References & Statutory Foundations

9.1. National Legislation (Republic of Kenya)

- **The Constitution of Kenya (2010):** Article 53 (1)(d) explicitly guarantees every child's right to be protected from abuse, neglect, harmful cultural practices, all forms of violence, inhuman treatment, and punishment.
- **The Children Act (2022):** The primary statutory framework regulating the care, protection, and welfare of children in Kenya, mandating institutional reporting structures and defining minor-appropriate legal procedures.
- **The Sexual Offences Act (2006):** Outlines clear definitions, evidentiary rules, and strict criminal penalties regarding the sexual abuse, exploitation, and defilement of minors.
- **The Basic Education Act (2013):** Section 4 (p) strictly prohibits the administration of corporal punishment, mental harassment, or physical torture within any Kenyan educational institution.
- **The Computer Misuse and Cybercrimes Act (2018):** Provides the legal parameters for criminalizing the creation, possession, or distribution of Child Sexual Abuse Material (CSAM) and online grooming.
- **The Data Protection Act (2019):** Regulates how sensitive personal data—specifically highly classified child protection and medical records—must be securely collected, processed, and stored.
- **The Prohibition of Female Genital Mutilation Act (2011):** Criminalizes the practice of FGM and outlines penalties for anyone who performs, aids, or fails to report the practice.

9.2. National Curriculum & Ministerial Frameworks

- **Kenya Institute of Curriculum Development (KICD):** Basic Education Curriculum Framework (BECF) mandates the integration of Pertinent and Contemporary Issues (PCIs), Values, and Life Skills Education within the CBC/CBE stream.
- **Teachers Service Commission (TSC) Act (2012):** Dictates the Code of Regulations for Teachers, specifically clauses regarding professional misconduct, safer recruitment, and automatic deregistration for offenses against learners.

9.3. International Benchmarks

United Nations Convention on the Rights of the Child (UNCRC, 1989): Specifically Article 19, protecting children from all forms of physical or mental violence, injury, abuse, neglect, maltreatment, or exploitation.

Institutional Endorsement

This policy stands as the definitive safeguarding authority for Granada School (Junior School & Senior School). It will be formally reviewed, audited, and updated every 12 months by the Full Governing Board to reflect any emerging updates in Kenyan statutory law or national education standards.

Approved and executed by:

Jedidah Mwangi,
Executive Principal,
Granada School



Signature: _____ | Date: 17th September 2026



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