

# Aotearoa Infinite Academy

## Safeguarding and Child Protection Policy



# Contents Page

<b>Introduction</b>	<b>5</b>
<b>Purpose and Ethos</b>	<b>6</b>
<b>Scope and Application</b>	<b>7</b>
Who the Policy Applies To	7
Where and How the Policy Applies	7
<b>Key Safeguarding Contacts</b>	<b>8</b>
<b>Definitions</b>	<b>9</b>
Child / Young Person	9
Safeguarding	9
Harm	9
Abuse	9
Neglect	10
Significant Harm	10
Forms of Abuse in Specific Contexts	10
Online Abuse	10
Peer-on-Peer Abuse	10
Contextual Safeguarding	11
Designated Roles	11
Designated Safeguarding Lead (DSL)	11
Deputy DSL	11
Responsible Adult	11
Third-Party Provider	11
<b>Responsibilities and Roles</b>	<b>12</b>
Designated Safeguarding Leads (DSLs)	12
All Staff and Responsible Adults	13
Parents, Guardians, and Carers	13
Students	13
Legal and Compliance Team	14
External Authorities	14
Board of Governors / Governance Leadership	14
<b>Recognising Abuse and Neglect</b>	<b>14</b>
Categories of Abuse	15
Specific Risks in Online and Distance Learning	16
Signs of Abuse and Behavioural Indicators	16
Cultural and Legal Considerations	16
<b>Prevention and Early Help</b>	<b>17</b>

Embedding Protective Factors Across the Learning Environment	17
Pastoral Support Structures	17
Learning for Life (LfL) Programme	17
Wellbeing and Early Intervention	18
Parent and Family Partnership	18
Early Identification and Student Support	18
Individual Educational Needs and Abilities (IENA)	18
Student Attendance and Engagement	19
Student Voice and Empowerment	20
<b>Procedures for Reporting Concerns</b>	<b>20</b>
How to Report a Concern	20
For Students	20
For Staff and Responsible Adults	20
What Should Be Reported	21
Why Recording Matters	21
How and What to Record	21
What Happens to the Record	22
Who Can See the Record	22
Confidentiality and Escalation	22
<b>Allegations Against Staff or Contractors</b>	<b>22</b>
Reporting Allegations	23
Immediate Safety and Separation	23
Internal Investigation and External Reporting	24
Suspension and Protective Action	24
Whistleblower Protections	24
<b>Safer Recruitment</b>	<b>25</b>
Scope and Safeguarding Threshold	25
Initial Safety Checks	26
Periodic (Ongoing) Safety Checks	26
Consistency Across Roles	27
Contractual Safeguarding Obligations	27
Oversight and Record-Keeping	27
<b>Induction, Training &amp; Development</b>	<b>27</b>
Induction Training (Mandatory Before Working With Students)	27
Annual Refresher Training	28
Role-Specific and Advanced Training	28
Adaptation to Online and Distance Learning	29
Quality Assurance	29
<b>Policy Governance and Review</b>	<b>29</b>

Ownership and Oversight	29
Annual Review Cycle	30
Interim Reviews and Urgent Updates	30
Communication and Access	30
Version Control	31

# Introduction

At Aotearoa Infinite Academy, we are driven by a clear and urgent mission: to create a world where geography, learning preferences, or family income do not determine a student's future; to place wellbeing, purpose, and connection at the centre of education; and to build the educational ecosystem for the 22nd century. Our goal is to provide high-quality schooling for young people across New Zealand who might otherwise lack access due to financial or geographical constraints, or because the traditional classroom isn't the right fit for their learning style, pace, or aspirations. We seek to create a safe, supportive, and aspirational learning environment where every student can thrive — academically, socially, and emotionally — and to open doors to further study, meaningful careers, and purposeful futures.

At the core of our educational philosophy is a firm belief that **child safety and wellbeing are not peripheral considerations, but integral to our organisational leadership, governance, and culture**. Safeguarding is embedded into every level of our operations — from board oversight and executive leadership, to curriculum design and the daily conduct of teachers, tutors, and support staff. It is a foundational obligation that underpins our ability to deliver effective, personalised, and aspirational education to all learners.

This Safeguarding and Child Protection Policy outlines how we promote the welfare of children and young people, prevent abuse and neglect, and respond to concerns or disclosures. It applies to all students enrolled at Aotearoa Infinite Academy. It also applies to all staff, contractors, and volunteers who engage with students in any capacity.

We recognise that our students learn primarily through synchronous online lessons and remote instruction, with some also attending community-based learning spaces. Our commitment is to ensure that every student, regardless of where or how they learn, is entitled to the same high standard of safeguarding, care, and oversight. This includes particular attention to the distinct risks of online interaction and distance learning.

Our approach is guided by New Zealand's legal and best practice frameworks, including:

- Children's Act 2014
- Oranga Tamariki Act 1989
- Education and Training Act 2020
- Ministry of Education and Netsafe online safety guidance

We acknowledge the complexities of safeguarding in a digitally enabled context and ensure our policies and procedures reflect those realities.

This policy sits alongside other key policies, including our Anti-Bullying Policy, Online Safety Policy, and Complaints Procedure. Students will also have access to a student-facing version of

this policy to support understanding and engagement. Together, these documents reflect our commitment to creating safe, inclusive, and empowering environments in which all students can thrive.

## Purpose and Ethos

The purpose of this policy is to ensure that all students at Aotearoa Infinite Academy are protected from harm and empowered to flourish in safe, respectful, and inclusive environments. We believe that safeguarding is not only a legal imperative but a reflection of our ethical values and educational purpose. It underpins every relationship we form, every system we build, and every lesson we deliver.

At Aotearoa Infinite Academy, we recognise that students thrive when they feel physically, emotionally, and psychologically secure. Our safeguarding culture is therefore proactive, not reactive. We focus on creating environments — both physical and online — where children and young people are listened to, respected, and supported to become active participants in their own wellbeing and development.

We are committed to the following core principles:

- **Child safety and wellbeing are embedded in leadership, governance, and culture.** Safeguarding is a whole-organisation responsibility, championed from the boardroom to the classroom. Leadership decisions are made with child safety as a foundational priority, not an afterthought.
- **Children and young people are empowered about their rights, involved in decisions that affect them, and taken seriously.** We foster environments that encourage student voice, enable meaningful participation, and support agency — especially in digital learning spaces, where transparency, respectful engagement, and developmental appropriateness are critical.
- **Families and communities are informed and actively involved in promoting child safety and wellbeing.** We believe that safeguarding is most effective when there is open communication and shared responsibility between the school, the home, and the wider community. We seek to partner with families to ensure consistency, trust, and shared values across settings.
- **Safeguarding is a lived ethos, not just a policy.** Whether a student is joining small-group online classes, participating in large live lectures, or engaging in a community-based learning space, they are entitled to feel safe, supported, and understood. Every staff member, tutor, and adult in our community has a duty to uphold that right, regardless of their role or location.

This policy is adopted in accordance with the requirements of the Children's Act 2014, which obliges all school boards to maintain and regularly review a child protection policy, to make it

publicly available, and to ensure that it extends to all relevant contractors and providers of children's services. It is also informed by the best available child protection practices, while recognising and adapting to the specific challenges of delivering safe, high-quality education in a digital-first context. In all cases, our guiding standard is clear: the best interests of the child come first.

## Scope and Application

This policy applies to all individuals and environments connected to Aotearoa Infinite Academy. Its scope reflects our commitment to uphold a consistent and rigorous standard of safeguarding across every part of our school, while recognising the practical and legal realities of delivering education primarily through online platforms within New Zealand.

## Who the Policy Applies To

This policy applies to:

- **All students** enrolled at Aotearoa Infinite Academy
- **All adults involved in the delivery or support of education**, including:
  - Teachers, tutors, and learning assistants
  - Pastoral, administrative, and support staff
  - Executive and governance personnel
  - Volunteers
  - Contractors and third-party providers engaged in student-facing services
  - Any other adult working with, supervising, or interacting with students under the remit of Aotearoa Infinite Academy

Every person who interacts with students through our programs bears a clear safeguarding responsibility—regardless of employment status, location, or form of engagement.

## Where and How the Policy Applies

This policy applies to **all environments in which Aotearoa Infinite Academy operates**, including:

- **Virtual learning environments**, including online classrooms, video conferencing platforms, and digital learning management systems.
- **Individual contact between staff and students**, including one-to-one meetings such as academic coaching, pastoral support, mentoring, feedback sessions, or other approved individual interactions (online or in person) where a student and an adult may be alone.
- **Community-based learning spaces**, any in-person environments or hubs arranged or endorsed by the school to support students' learning.

- **School-related travel, excursions, and events**, including occasional off-site learning or meet-ups facilitated the school.
- **Pastoral care and wellbeing services**, including those provided digitally or by external professionals.
- **Extracurricular activities**, enrichment programs, and co-curricular offerings that occur under the school’s supervision or endorsement.

Safeguarding obligations continue to apply whether students are engaging synchronously or asynchronously, on-site or remotely, in small groups or larger class settings.

All members of the Aotearoa Infinite Academy community share the responsibility of ensuring that these environments are safe, inclusive, and protective of children and young people. No context — physical, digital, or hybrid — is exempt from this duty of care.

## Key Safeguarding Contacts

Aotearoa Infinite Academy has appointed Designated Safeguarding Leads (DSLs) who are responsible for overseeing the implementation of child protection practices, responding to concerns, and ensuring compliance with New Zealand legal requirements and the school’s safeguarding standards.

DSLs act as the first point of contact for any safeguarding concerns, disclosures, or allegations involving students, staff, contractors, or other adults connected with the school. They provide advice and support to staff, liaise with statutory agencies where appropriate (such as Oranga Tamariki or the New Zealand Police), and ensure that concerns are handled in a timely, consistent, and protective manner.

DSLs receive specialist training on New Zealand’s legal, procedural, and cultural context, including the Children’s Act 2014 and Ministry of Education guidance on child protection and online safety. They are also trained to understand the unique safeguarding challenges of online-first and distance learning environments.

The following table provides the current contact details of each DSL, along with their role, location, and area of responsibility.

Name & Role	Location	Responsibility	Email
Saira Boyle, <i>Principal</i>	Auckland, New Zealand	Whole-school safeguarding & compliance oversight	s.boyle@aotearoainfiniteacademy.school
Sian Durbin, <i>Deputy</i>	Auckland,	Online learning	s.durbin@aotearoainfiniteacademy.school



<i>Principal</i>	New Zealand	safeguarding and student wellbeing	my.school
Safeguarding Team	Available to anyone at Aotearoa Infinite Academy		safeguarding@aotearoainfiniteacademy.school

## Definitions

The following definitions are used throughout this policy and are based on New Zealand statutory guidance and international best practice. They clarify the scope of responsibilities, behaviours, and risks covered by our safeguarding framework.

### Child / Young Person

For the purposes of this policy, a child or young person means any individual under the age of 18, consistent with the Oranga Tamariki Act 1989 and the Children's Act 2014. Where a student over 18 remains enrolled and is particularly vulnerable (for example, still dependent on parental care or has special learning needs), Aotearoa Infinite Academy may continue to apply child protection standards to ensure their safety and wellbeing.

### Safeguarding

**Safeguarding** refers to the proactive measures taken to promote the welfare of children and to protect them from harm. This includes:

- Preventing abuse and maltreatment
- Promoting mental and physical health and wellbeing
- Ensuring a safe and supportive learning environment
- Taking action to enable all children to have the best outcomes

### Harm

**Harm** encompasses any detrimental effect on a child's physical, emotional, psychological, or developmental wellbeing. It may result from abuse, neglect, exploitation, or exposure to unsafe environments or relationships.

### Abuse

**Abuse** refers to any act, or failure to act, which results in actual or potential harm to a child. It can be perpetrated by adults or peers and can take several forms, including:

- **Physical abuse** – causing physical harm through hitting, shaking, burning, etc.
- **Emotional abuse** – persistent emotional maltreatment, belittling, or threatening behaviour
- **Sexual abuse** – forcing or enticing a child to take part in sexual activities (including online)
- **Neglect** – persistent failure to meet a child’s basic physical or emotional needs

## **Neglect**

**Neglect** involves the ongoing failure to meet a child’s essential needs. It can include deprivation of food, clothing, shelter, supervision, access to healthcare, or emotional nurturing.

## **Significant Harm**

Significant harm is the threshold for statutory child protection intervention in New Zealand. It refers to harm serious enough to affect a child’s health, development, or safety and is a key concept guiding mandatory reporting and escalation to Oranga Tamariki or Police.

## **Forms of Abuse in Specific Contexts**

### **Online Abuse**

**Online abuse** includes any abuse that occurs through digital platforms, such as video conferencing, messaging apps, social media, gaming, or email. It may include:

- Grooming and exploitation
- Cyberbullying
- Non-consensual sharing of images or videos
- Online radicalisation
- Emotional manipulation or coercion

### **Peer-on-Peer Abuse**

**Peer-on-peer abuse** refers to situations where children or young people harm other children. It can include:

- Bullying (including cyberbullying)
- Physical violence
- Sexual harassment or assault
- Initiation rituals or hazing
- Controlling behaviours in peer relationships

Aotearoa Infinite Academy recognises that all forms of peer abuse must be taken seriously and responded to in the same manner as abuse perpetrated by adults.

## **Contextual Safeguarding**

**Contextual safeguarding** refers to an approach that considers the social, cultural, and environmental factors beyond the immediate family that may pose risks to a child. These may include:

- Peer group norms and online culture
- School or digital community dynamics
- Unsafe home-learning environments
- Extracurricular and third-party learning settings

## **Designated Roles**

### **Designated Safeguarding Lead (DSL)**

A Designated Safeguarding Lead (DSL) is a senior staff member with primary responsibility for managing safeguarding concerns, maintaining policy compliance, and liaising with external agencies such as Oranga Tamariki and the New Zealand Police when required. Aotearoa Infinite Academy has appointed DSLs who are trained in the Children's Act 2014, Oranga Tamariki Act 1989, Ministry of Education guidance, and best practices for online and distance learning safety.

### **Deputy DSL**

A Deputy DSL is an individual who is deputised to act in the DSL's stead when the DSL is unavailable or requires support in fulfilling safeguarding responsibilities.

### **Responsible Adult**

A **Responsible Adult** is any adult in a position of trust or authority over a student within the Aotearoa Infinite Academy context. This includes teachers, learning assistants, pastoral and support staff, volunteers, contractors, and any other adults supervising or engaging with students. All Responsible Adults are subject to the standards and expectations set out in this policy, including mandatory training, safe conduct, and reporting obligations.

### **Third-Party Provider**

A **Third-Party Provider** is an individual or organisation providing services to students on behalf of or under the endorsement of Aotearoa Infinite Academy (e.g., digital platforms, specialist teaching, pastoral or wellbeing support, extracurricular offerings). All Third-Party Providers working with students must comply with the school's safeguarding standards, including police vetting or equivalent safety checks, clear conduct requirements, and contractual obligations aligned with the Children's Act 2014 (e.g., adoption of a child protection policy where required).

# Responsibilities and Roles

At Aotearoa Infinite Academy, safeguarding is a collective responsibility shared across all levels of the school. Everyone who works with or around children has a duty of care to protect them from harm and to promote their wellbeing. While Designated Safeguarding Leads (DSLs) hold specific roles in managing safeguarding processes, every staff member, student, and family plays a vital part in creating a safe and protective learning environment.

## Designated Safeguarding Leads (DSLs)

Aotearoa Infinite Academy has DSLs responsible for the day-to-day oversight of safeguarding and child protection matters. DSLs are trained in New Zealand law and guidance, including the Children's Act 2014, Oranga Tamariki Act 1989, and Ministry of Education standards for online and distance learning safety. They serve as the first point of contact for concerns, disclosures, or reports of harm.

Their responsibilities include:

- **Making referrals** to statutory agencies such as Oranga Tamariki or the New Zealand Police when there is risk of significant harm.
- **Maintaining detailed and secure records** of all safeguarding concerns, regardless of whether they result in an immediate referral.
- **Storing records confidentially**, separate from academic files, and in accordance with legal data retention periods (e.g. until the young person's 25th birthday). Records must be transferred, where appropriate, to the next school or educational institution.
- **Liaising with other agencies and professionals**, including social services, medical providers, and educational psychologists, as needed.
- **Attending or arranging representation** at multi-agency meetings, including case conferences, planning reviews, or child protection strategy meetings.
- **Ensuring that all staff receive regular safeguarding training**, including:
  - Annual full safeguarding training for all staff
  - Refresher or targeted training during professional development days or induction sessions
  - Informal guidance and case consultation where required
- **Supporting staff and students** in understanding safeguarding responsibilities and fostering a culture of vigilance and proactive reporting.

## All Staff and Responsible Adults

Every staff member, tutor, contractor, or adult working in a Aotearoa Infinite Academy setting is considered a **Responsible Adult**. This includes classroom teachers, online instructors, tutors, administrative staff, extracurricular providers, and volunteers.

All Responsible Adults must:

- Prioritise the safety and welfare of every student in their care.
- Be aware of the signs of abuse and neglect and know how to recognise potential harm.
- **Report any concerns about a student's welfare immediately to a DSL, even if the concern seems minor.**
- Follow the school's safeguarding procedures and maintain confidentiality.
- Complete all required safeguarding training and refresher sessions as directed.

No concern is too small to report. The responsibility to act lies with **every adult**, not just safeguarding specialists.

## Parents, Guardians, and Carers

Parents and guardians are essential partners in promoting the safety and wellbeing of students. Aotearoa Infinite Academy seeks to work openly and collaboratively with families by:

- Keeping parents informed about our safeguarding policies, procedures, and expectations.
- Involving families in relevant aspects of safeguarding planning and responses, where appropriate and safe.
- Encouraging parents to raise concerns about their child or others in confidence and without fear of reprisal.
- Supporting parents in accessing external help (e.g. counselling services or family support agencies) if needed.

## Students

Students are central to our safeguarding culture and are actively encouraged to participate in creating safe, respectful environments. All students have the right to:

- Learn in an environment free from abuse, harm, and exploitation.
- Know how to identify unsafe situations, both online and in person.
- Understand their rights to safety, privacy, and participation.
- Speak up without fear of judgment or retaliation if they feel unsafe.
- Be heard, taken seriously, and supported appropriately when they disclose a concern.

Aotearoa Infinite Academy supports student agency through age-appropriate safeguarding education, pastoral systems, and open dialogue.

## Legal and Compliance Team

The Legal and Compliance function provides:

- Ongoing oversight of legal and regulatory obligations.
- Advisory support to DSLs and leadership on complex or high-risk cases.
- Policy review and updates, ensuring the safeguarding framework reflects current legislation and best practice.
- Liaison with external legal or government bodies in cases involving legal complexity or reputational risk.

## External Authorities

Aotearoa Infinite Academy cooperates fully with statutory agencies, including:

- Oranga Tamariki and child protection services
- New Zealand Police
- Health and psychological services
- The Ministry of Education, the Education Review Office, and any other regulators

DSLs are responsible for initiating referrals, following up on actions taken, and ensuring student safety throughout external investigations.

## Board of Governors / Governance Leadership

The Board (or equivalent governance entity) holds ultimate accountability for safeguarding. Their responsibilities include:

- Ensuring that safeguarding is embedded in all aspects of strategic and operational planning.
- Reviewing and approving safeguarding policies annually, or following major incidents or legal changes.
- Appointing appropriately trained and resourced DSLs.
- Monitoring safeguarding performance indicators (e.g. incident reports, training compliance, audit outcomes).
- Ensuring a culture of **transparency, challenge, and continuous improvement** in relation to child protection.

## Recognising Abuse and Neglect

Aotearoa Infinite Academy is committed to identifying and responding promptly to all forms of abuse and neglect. Staff and Responsible Adults must remain alert to potential signs of harm in every setting — whether physical, virtual, or during approved individual contact — and take appropriate action in accordance with this policy.

Abuse can take many forms and may be perpetrated by adults or peers. It may occur in the home, in school environments (online or physical), or in third-party learning spaces. It can also be subtle, cumulative, and hard to detect — especially in digital contexts, where body language, physical injuries, or interpersonal dynamics may be obscured.

## Categories of Abuse

The following categories of harm are recognised under New Zealand child protection frameworks and international best practice. All apply equally in digital and physical environments:

- **Physical Abuse** – The deliberate infliction of physical harm or injury. This may include hitting, shaking, burning, poisoning, or misuse of medication or restraint. It is most likely to be observed in physical school settings or disclosed by students.
- **Emotional Abuse** – Persistent emotional maltreatment such as belittling, shaming, isolating, threatening, or intimidating behaviour. In digital contexts, this can include coercive control, repeated criticism during online lessons, or exclusion from group activities.
- **Sexual Abuse** – Involving a child in a sexual activity, whether or not they are aware of what is happening. This includes non-contact abuse, such as grooming, exhibitionism, or the sharing of sexual content (e.g., via messaging apps or webcam). Online abuse of this kind can occur without physical proximity.
- **Neglect** – The persistent failure to meet a child’s basic physical or emotional needs. Neglect may be harder to detect in online settings but can manifest through consistent disengagement, signs of hunger or fatigue, lack of access to a safe learning environment, or inappropriate supervision during lessons.
- **Peer-on-Peer Abuse** – Abuse perpetrated by other children or young people. This includes bullying (including cyberbullying), sexual harassment or assault, initiation rituals, and coercive relationships. Peer-on-peer abuse can happen in physical classrooms or digital spaces such as chat functions, forums, or social media.
- **Online Abuse** – Any abuse that takes place via technology. This includes:
  - Grooming or exploitation through social media or chat platforms
  - Non-consensual image sharing
  - Cyberbullying, trolling, or humiliation
  - Identity-based harassment (e.g., racism, homophobia, misogyny)
  - Use of AI or deepfakes to harass or manipulate

- **Institutional or Organisational Abuse** – Harm that arises from systemic failings in supervision, vetting, policies, or cultures of silence. In digital learning environments, this can include lack of oversight or monitoring during individual contact with students, inappropriate staff-student boundaries, or the normalisation of harmful online discourse.

## Specific Risks in Online and Distance Learning

Aotearoa Infinite Academy recognises that our online-first delivery model creates unique safeguarding risks:

- **Reduced visibility** – Staff may have fewer physical cues (e.g. bruising, non-verbal distress) to identify abuse. This makes tone of voice, demeanour, attendance patterns, and consistency of engagement critical indicators.
- **Private digital interactions** – While most learning occurs in group classes, staff may need to meet students individually (e.g., mentoring, pastoral support, assessment feedback). Such interactions must follow the school's safeguarding protocols, including clear professional boundaries and use of approved platforms.
- **Cultural differences** – Cultural norms around discipline, privacy, and family roles vary. Aotearoa Infinite Academy respects diversity but always acts to protect students when harm is suspected or disclosed.
- **Online disinhibition** – Students may experience increased peer conflict, inappropriate disclosures, or exposure to harmful content in unmoderated online settings.

## Signs of Abuse and Behavioural Indicators

Staff should be vigilant for **patterns of behaviour** or **changes over time** that could indicate abuse or neglect. Indicators may include:

- Sudden withdrawal from online classes or extracurriculars
- Consistent lateness or absenteeism without explanation
- Decline in academic performance or participation
- Visible distress, anxiety, or fearful behaviour
- Inappropriate clothing, language, or topics in class discussions
- Disclosures (direct or indirect) of mistreatment or harm
- Unexplained injuries (if seen in physical settings or on video call)
- Excessive control or monitoring by adults during online sessions
- Evidence of cyberbullying, grooming, or unsafe digital activity

Staff should be particularly alert to changes over time, patterns of concern across contexts, or behaviours that seem inconsistent with the student's usual profile.

## Cultural and Legal Considerations



Staff should consider New Zealand’s legal definitions of harm and the cultural context in which a student lives. However:

- If behaviour appears concerning in light of this policy and the best interests of the child, it must be reported, even if there is uncertainty about cultural norms or legal thresholds.
- Cultural sensitivity must never override the duty to protect a child.
- Where a threshold of significant harm appears to be met, the DSL will consider referral to Oranga Tamariki or the New Zealand Police.

## **Prevention and Early Help**

At Aotearoa Infinite Academy, safeguarding begins with a proactive culture of prevention, inclusion, and early support. We believe every student deserves to feel safe, respected, and supported — not only when harm occurs, but through the ongoing relationships, structures, and learning environments that protect them before problems escalate.

We take a whole-community approach, combining wellbeing education, pastoral care, and strong school-home partnerships to ensure every student — regardless of background, circumstance, or learning profile — has the support needed to thrive.

## **Embedding Protective Factors Across the Learning Environment**

Protective factors are intentionally built into Infinite’s online-first model and day-to-day practice:

### **Pastoral Support Structures**

- Each student is assigned a Form Teacher as a consistent pastoral contact.
- Weekly Form Time provides space to check in, build relationships, and discuss wellbeing, safety, and school life in a more informal setting.
- Attendance is checked and changes in participation or engagement are monitored as early indicators of risk.

### **Learning for Life (Lfl) Programme**

- All students participate in weekly “Learning for Life” classes, designed to build the knowledge, skills, and attributes needed to manage life safely and confidently.
- Lfl covers key safeguarding and personal development topics, including:
  - Digital citizenship and online safety
  - Health and wellbeing (emotional regulation, resilience, mental health)
  - Relationships and respectful communication
  - Study and examination skills

- University and career planning

### **Wellbeing and Early Intervention**

- Form Teachers, Deans, and the Inclusion Manager work together to spot early signs of difficulty — whether academic, emotional, or social.
- Students can be referred to a qualified school counsellor for confidential support and, if needed, connected to external specialist services close to where they live.

### **Parent and Family Partnership**

We recognise that student wellbeing and safety are strongest when families and school work together. The Parent Partnership Programme is designed to equip and engage parents as active partners in safeguarding and development:

- Monthly live sessions for parents on topics such as social media use, cybersecurity, AI and plagiarism, adolescent wellbeing, and strategies for supporting academic success.
- Regular focus groups and community conversations to gather parent insights and strengthen shared responsibility for student wellbeing.
- Clear, reliable communication channels so families are informed, connected, and able to raise concerns early.

This partnership ensures that parents are empowered and confident to support their child's safety and personal growth, particularly in an online-first environment.

### **Early Identification and Student Support**

We understand that early signs of difficulty — academic, emotional, or social — can be the first indicators of risk. Aotearoa Infinite Academy offers structured, responsive support, coordinated by our Inclusion Manager (formerly, SENCo) and wider support team.

### **Individual Educational Needs and Abilities (IENA)**

Aotearoa Infinite Academy recognises and supports the broad spectrum of Individual Educational Needs and Abilities (IENA). This inclusive term reflects our belief that every learner brings unique strengths, challenges, and ways of engaging with the curriculum. IENA includes:

- Specific learning differences (e.g., dyslexia, autism, ADHD)
- Emotional, sensory, or physical support needs
- Circumstantial factors affecting learning (e.g., transitions, family dynamics)
- Gifted and twice-exceptional learners needing differentiated provision

### **Inclusion Manager**

Our Inclusion Manager (formerly, SENCo), coordinates:

- Assessment and review of students requiring additional support
- Development of Individualised Education Plans (IEPs)
- Liaison between families, teachers, tutors, and external specialists
- Ongoing monitoring and support to ensure effective adjustments are in place

### **Counselling Services**

Our qualified school counsellor, with a background in teaching, offers:

- Individual therapeutic support for students facing personal, emotional, or social challenges
- Coordination with Deans and the Inclusion Manager
- A non-judgmental, confidential space to help remove emotional barriers to learning

### **Student Attendance and Engagement**

Maintaining strong attendance and engagement is essential to both learning and student safety. At Aotearoa Infinite Academy, these measures are monitored not only for academic progress but also as early indicators of wellbeing or safeguarding concerns.

- **Recording & Alerts:** Attendance is recorded for every live class using Ministry of Education–approved codes in the school’s Student Management System (SMS) and unexplained absences trigger same-day SMS and email alerts to caregivers and follow-up by Form Teachers.
- **Student Engagement Score:** To ensure attendance reflects meaningful learning, Aotearoa Infinite Academy calculates a Student Engagement Score combining live class presence, assignment completion, participation data (e.g., logins, polls, breakout rooms, camera use), and use of learning tools. Scores are reviewed weekly by Form Teachers and Deans and students flagged for low engagement are followed up within 48 hours.
- **STAR Framework:** To respond proportionately to attendance risk, Aotearoa Infinite Academy uses a four-tier Stepped Attendance Response (STAR) framework:
  - Tier 1 (≥90%) – Universal: Positive reinforcement, parent visibility, and early nudges.
  - Tier 2 (80–89%) — Targeted: Teacher outreach, student check-ins, and parent contact.
  - Tier 3 (70–79%) — Intensive: Individualised Attendance Improvement Plan (AIP), counselling, and Inclusion referral if needed.
  - Tier 4 (<70%) — Critical: Intensive case management, escalation to the Principal, and involvement of external support if risk indicators emerge
- **Review & Safeguarding Link:** Attendance and engagement is reviewed and audited regularly to track patterns and risk trends. When absence or disengagement suggests a

student may be at risk of harm, the case is escalated to a Designated Safeguarding Lead (DSL) and managed under the school's safeguarding procedures [*Procedures for Reporting Concerns*].

## Student Voice and Empowerment

Students are taught about their rights, boundaries, and how to ask for help through structured wellbeing and LfL sessions. We provide:

- Multiple trusted adults (Form Teachers, Deans, LSAs, counsellors) whom students can approach.
- Opportunities for students to share feedback through surveys, leadership roles, and forums that help shape school culture.
- Education on safe digital behaviour and clear pathways for self-referral when they feel unsafe or worried.

## Procedures for Reporting Concerns

At Aotearoa Infinite Academy, safeguarding is everyone's responsibility. We expect and encourage all members of our community — students, staff, tutors, contractors, and volunteers — to raise concerns when they believe a child may be at risk of harm. This includes suspected or disclosed abuse, neglect, peer-on-peer harm, wellbeing issues, or any situation that creates concern about a student's safety.

We provide clear, accessible channels for reporting so concerns can be acted on quickly and appropriately in our online-first learning environment and any community-based activities.

### How to Report a Concern

Concerns should be reported through one of the following channels:

#### For Students

- Speak directly with any **teacher**, including your **Form Teacher**
- Speak with your **Pastoral Care Dean** or another trusted adult at the school
- Speak to or email a **DSL** listed in the table in [*Key Safeguarding Contacts*]
- Use the “**I need help**” feature on **Infinite Learn** to submit a **safeguarding concern form**
- Use the “**Report Message**” function in **Microsoft Teams** if a safeguarding concern arises during a chat or discussion

#### For Staff and Responsible Adults

- Speak to or email a **DSL** listed in the table in [*Key Safeguarding Contacts*]
- Submit a **safeguarding concern form**. This form asks for:
  - Your name and contact details
  - Basic information about the concern
  - Who is involved
  - What was seen, heard, or disclosed

## What Should Be Reported

Concerns may include, but are not limited to:

- Suspected or confirmed abuse or neglect
- Unsafe or inappropriate behaviour by an adult or peer
- Emotional distress, self-harm, or mental health concerns
- Online grooming, cyberbullying, or exposure to unsafe digital content
- Changes in behaviour, mood, or attendance that raise concern
- Any situation where a child appears to be at risk of harm, regardless of certainty

Remember: **you do not need proof to report a concern** — only a reasonable belief that something may not be right.

## Why Recording Matters

Recording safeguarding concerns is essential because it:

- Provides a clear and objective record of events or disclosures
- Allows the DSL/CSO to monitor patterns of behaviour over time
- Enables appropriate and timely follow-up with students, families, and external agencies
- Ensures that legal, regulatory, and duty of care obligations are met

A written record often becomes the starting point for further assessment, protection planning, or external referral.

## How and What to Record

Reporters must:

- Record the concern as soon as possible after becoming aware of it
- Use clear, factual, and objective language
- Include:
  - Date, time, and method of disclosure or observation
  - Names of those involved

- Exact wording of any disclosure (use quotation marks)
- Actions taken (e.g. support offered, contact with parents)

Avoid speculation or assumptions. Focus on what was seen, heard, or said.

## **What Happens to the Record**

- Once submitted, the report is reviewed by a DSL
- The concern is logged in a secure safeguarding system, separate from academic records
- Only authorised members of the safeguarding team can access these records
- Reports are retained in line with legal and regulatory requirements, typically until the student's 25th birthday
- Records may be transferred to a student's next school or educational provider where required for continuity of care and legal compliance

## **Who Can See the Record**

- Only members of the safeguarding team (DSLs and relevant leadership) can access concern records
- Parents, carers, and mentors do not automatically see safeguarding reports, but:
  - May be informed when appropriate and safe, unless doing so would put the student at further risk
  - Will be involved in follow-up actions when it is safe and in the child's best interests
- In cases involving external agencies (e.g., Oranga Tamariki, New Zealand Police), relevant information may be shared in line with law and best practice

## **Confidentiality and Escalation**

- All concerns are handled with professional discretion and confidentiality
- Staff cannot promise to keep information secret if a child may be at risk
- When in doubt, staff must report the concern — a DSL will assess whether further action is needed
- Where required, a DSL will escalate the concern to:
  - Oranga Tamariki
  - New Zealand Police
  - Other relevant statutory or wellbeing services
  - Internal leadership for support or coordination

## **Allegations Against Staff or Contractors**

Aotearoa Infinite Academy takes all allegations of misconduct, harm, or inappropriate behaviour by staff, contractors, tutors, or volunteers extremely seriously. Any concern that an adult working within the organisation may have:

- Harmed a student
- Behaved in a way that could indicate they pose a risk to children or young people
- Violated professional boundaries or safeguarding expectations
- Acted in a manner that is incompatible with working in a child-safe environment

...must be treated as a safeguarding matter and addressed through the same channels and procedures as any other safeguarding concern.

## Reporting Allegations

Students, staff, or any member of the Aotearoa Infinite Academy community may report an allegation of concern using the same channels outlined in [*Procedures for Reporting Concerns*]:

- Speak directly with any teacher
- Speak to or email a DSL listed in the table in [*Key Safeguarding Contacts*]
- Use the “I need help” feature on Infinite Learn to submit a safeguarding concern form

*There is no separate form or process for allegations against staff or contractors. This consistency is deliberate — to reduce confusion and make reporting straightforward.*

If the concern involves a Designated Safeguarding Lead (DSL) themselves, the report should be made directly to:

- The Chief Executive Officer at p.barton@aotearoainfiniteacademy.school
- The Legal and Compliance Team at legal@aotearoainfiniteacademy.school

These individuals will manage the concern independently of the DSL implicated.

## Immediate Safety and Separation

Where an allegation involves **immediate risk to a student**, the first priority is the safety and protection of the student. Appropriate steps may include:

- Separating the student from the adult involved
- Reassigning supervision or teaching responsibilities
- Providing pastoral care and support for the student(s) affected
- Notifying relevant authorities without delay (e.g., Oranga Tamariki or New Zealand Police)

The DSL or senior leader receiving the report must assess the level of risk and act to prevent further harm.

## **Internal Investigation and External Reporting**

Once a report is received:

- The DSL (or the CEO or Legal Team, if appropriate) will conduct a preliminary safeguarding assessment
- Depending on jurisdiction and severity, the matter may be referred to:
  - New Zealand Police
  - Oranga Tamariki
  - Other regulatory or professional bodies as appropriate.

If the concern does not meet the threshold for external referral but still raises serious questions about professional conduct, the case will be managed under Aotearoa Infinite Academy's employment and disciplinary procedures, with support and oversight from the Legal and HR teams.

## **Suspension and Protective Action**

The decision to suspend a staff member or contractor during an investigation is made on a case-by-case basis, balancing:

- The need to protect students from potential harm
- The employment rights of the staff member, including natural justice and procedural fairness
- The impact on the learning environment and school operations

This decision is taken by the executive team in consultation with the CEO and the Legal Team, and — where appropriate — with guidance from statutory safeguarding agencies.

If the allegation concerns a member of the executive team, including the Principal, the CEO assumes direct oversight and decision-making responsibility.

## **Whistleblower Protections**

Aotearoa Infinite Academy is committed to a culture of transparency and accountability. Any individual who raises a safeguarding concern in good faith is protected from:

- Retaliation or victimisation
- Professional disadvantage or discrimination
- Legal consequences for honest, non-malicious reporting



Whistleblower reports will be treated with confidentiality and impartiality. Staff and students are encouraged to speak up without fear, knowing that their concerns will be handled seriously, fairly, and in the best interests of the child.

Aotearoa Infinite Academy acknowledges that some disclosures made under this policy may fall within the scope of the Protected Disclosures (Protection of Whistleblowers) Act 2022. This Act provides certain protections for individuals who make disclosures about serious wrongdoing in their workplace in accordance with the Act's requirements. Staff and other members of the school community who wish to understand how this legislation may apply to them should refer to Aotearoa Infinite Academy's Whistleblower Policy and may seek independent advice before making a disclosure. This policy does not limit any rights or protections available under the Act.

## **Safer Recruitment**

Aotearoa Infinite Academy is committed to ensuring that every adult engaged in work with students is safe, suitable, and legally compliant to work with children. Our recruitment and engagement processes are guided by the Children's Act 2014, the Children's (Requirements for Safety Checks of Children's Workers) Regulations 2015, and the Education and Training Act 2020. These laws set out the minimum legal requirements for safety checking all people who work with children in regulated services, including schools.

*No person may begin work with students at Aotearoa Infinite Academy until all legally required safety checks are completed and approved.*

## **Scope and Safeguarding Threshold**

A children's worker is defined in the Children's Act 2014 as a person who works in, or provides, a regulated service and:

- their work may or does involve regular or overnight contact with a child or children (other than with children who are co-workers), and
- the work takes place without a parent or guardian being present.

A core children's worker is a person whose work requires or allows them to be:

- the only children's worker present, or
- the children's worker who has primary responsibility or authority for the child or children present.

Every person directly employed by Aotearoa Infinite Academy whose role involves regular contact with students — including teachers, Deans, counsellors, Inclusion staff, and others

providing online instruction, mentoring, or pastoral support — is classified as a children's worker (core or non-core).

Corporate and support staff employed or engaged (e.g. IT, HR, finance, marketing) to support Aotearoa Infinite Academy's operations, but are not employed to work directly with students, are not legally children's workers. Where these roles may still access student information or systems, or could have unsupervised contact with students, Police vetting is completed under the Education and Training Act 2020, Schedule 4 requirements.

## **Initial Safety Checks**

Before any children's worker begins work at Aotearoa Infinite Academy, a full safety check must be completed. This includes:

- Confirmation of identity — sighting original identity documents and verifying authenticity
- New Zealand Police vetting — using the approved Police vetting service
- Chronological work history — covering the preceding five years (with explanations for gaps)
- Professional registration or licensing checks — e.g., Teaching Council of Aotearoa New Zealand if applicable
- Reference checks — at least one recent, relevant professional referee able to comment on suitability to work with children
- An interview — assessing motivation, attitudes to working with children, and understanding of safeguarding responsibilities
- A risk assessment — considering all the information above to determine whether it is safe to engage the person in work with children

No individual — regardless of role, status, or location — may begin working with students until all minimum requirements are met and approved by the Safeguarding and HR teams.

## **Periodic (Ongoing) Safety Checks**

All children's workers at Aotearoa Infinite Academy must undergo a full re-check at least every three years. Periodic checks must include:

- Re-confirmation of identity
- A fresh New Zealand Police vet
- Professional registration or licensing checks (if applicable)
- A risk assessment based on any new or updated information

## **Consistency Across Roles**

The same process applies to employees, contractors, volunteers, and any other adults who meet the statutory definition of a children's worker. Where a role is identified as a core children's worker, additional care is taken in risk assessment because of the higher level of responsibility and contact.

## **Contractual Safeguarding Obligations**

Every children's worker at the school — regardless of how they are engaged — must:

- Sign a declaration confirming suitability to work with children
- Agree to comply with this Safeguarding and Child Protection Policy
- Undertake mandatory safeguarding induction training and refreshers as required
- Consent to ongoing safety checks and monitoring
- Understand and accept mandatory reporting obligations under this policy and New Zealand law

## **Oversight and Record-Keeping**

- Safety check records are maintained securely by the HR and Safeguarding teams.
- Evidence of completed checks and re-checks is retained in line with Children's Act 2014 and privacy requirements.
- The Designated Safeguarding Leads (DSLs) and HR jointly oversee compliance with safety checking obligations and may audit records at any time.

## **Induction, Training & Development**

At Aotearoa Infinite Academy, safeguarding is most effective when every adult in the organisation understands their role, responsibilities, and the legal context in which they operate. As such, we provide structured and ongoing training for all staff, contractors, and third-party providers to ensure they are fully prepared to protect and promote the welfare of our students. Safeguarding training is mandatory.

### **Induction Training (Mandatory Before Working With Students)**

All individuals who meet the definition of a children's worker under the Children's Act 2014 — including teachers, pastoral staff, support staff, and contractors — must complete safeguarding induction training before starting any student-facing work.

This induction includes:

- An introduction to our Safeguarding and Child Protection Policy and Code of Conduct
- Legal duties and child protection frameworks in New Zealand, including mandatory reporting and the role of Oranga Tamariki and the New Zealand Police
- How to recognise, record, and report concerns using the school's procedures
- Expectations around professional boundaries, safe digital communication, and student relationships
- Safe practices for working in virtual classrooms and digital platforms
- What to do if a concern involves a colleague, supervisor, or senior leader

Induction training may be delivered online or in person and is recorded and monitored by the Safeguarding and HR teams.

## **Annual Refresher Training**

All staff and children's workers must complete safeguarding refresher training every year. This training:

- Reinforces core safeguarding principles and child-centred practice
- Updates staff on changes in law, policy, and emerging risks (e.g., online abuse trends, misuse of AI, privacy risks)
- Reaffirms reporting and escalation procedures
- Reviews case studies relevant to online and remote learning contexts

Annual refresher training may be delivered as part of ongoing professional development. Completion is recorded in the compliance register. Staff who fail to complete required refresher training may have their access to student-facing work suspended until training is complete.

## **Role-Specific and Advanced Training**

Certain roles at Aotearoa Infinite Academy require additional or advanced safeguarding training:

- **Designated Safeguarding Leads (DSLs)**
  - Must complete an approved DSL training programme and refresh/update training at least every two years
  - Receive additional scenario-based practice and interagency coordination training as needed
- **Pastoral care staff and Deans**
  - Extended training on mental health, trauma-informed practice, managing disclosures, and multi-agency referral pathways

- **IT and platform moderation teams**
  - Training on digital safeguarding, including monitoring of inappropriate content, managing online risk indicators, and responding to tech-based harm
- **Administrative staff**
  - Training to recognise early warning signs in their work (e.g., concerning attendance patterns, alarming communications) while respecting privacy and confidentiality

## **Adaptation to Online and Distance Learning**

Because Aotearoa Infinite Academy is online-first, training content emphasises::

- Recognising abuse when physical cues are absent (e.g., changes in demeanour, engagement patterns, or online interactions)
- Maintaining safe professional conduct in virtual spaces
- Understanding platform safety tools and when to escalate digital risks
- Cultural awareness — respecting diversity while acting on any reasonable belief that a child may be harmed, consistent with the best interests of the child principle in NZ law

## **Quality Assurance**

All training materials are reviewed annually by Aotearoa Infinite Academy's Safeguarding and Legal teams to ensure compliance with the Children's Act 2014, current NZ practice guidance, and emerging risks in online learning. Updates are rolled out promptly when legal or technological developments create new safeguarding considerations.

## **Policy Governance and Review**

Aotearoa Infinite Academy is committed to maintaining a dynamic and responsive safeguarding framework, one that evolves alongside legal developments, educational innovation, and the lived realities of our online-first school community. This Safeguarding and Child Protection Policy is a cornerstone of that framework and is reviewed and updated regularly to ensure it remains effective and compliant.

## **Ownership and Oversight**

- The policy is owned by the executive team, with operational responsibility delegated to the Designated Safeguarding Leads (DSLs) and the Legal and Compliance Team.

- The Board of Governors (or equivalent governing body) provides strategic oversight and formally approves the policy on at least an annual basis, in line with the Children's Act 2014 requirement for boards to maintain a child protection policy.

## **Annual Review Cycle**

This policy is reviewed at least once every academic year to ensure that it reflects:

- Changes in New Zealand safeguarding law or statutory guidance (e.g., Oranga Tamariki protocols, Ministry of Education updates, Police vetting requirements)
- Updates in best practice and lessons learned from safeguarding cases or audits
- Adjustments to the school's operating model, including digital delivery platforms or new programme structures
- Feedback from students, families, staff, or external safeguarding partners

## **Interim Reviews and Urgent Updates**

An interim review may be initiated at any time if:

- A serious safeguarding incident occurs revealing gaps or weaknesses
- There is a material change in legal obligations
- Feedback from staff, students, or auditors identifies systemic issues or recurring gaps
- The school introduces new delivery models or platforms that change risk exposure

Where urgent updates are required, an interim addendum may be published and implemented immediately while the full review process is underway.

## **Communication and Access**

- The most current version of this policy is published on Aotearoa Infinite Academy's public website and in other locations readily accessible by staff, students, and families (e.g., Infinite Learn and Infinite Insights)
- Any updates or changes are:
  - Communicated to staff through internal bulletins and safeguarding briefings
  - Integrated into annual safeguarding training and induction materials
  - Shared with contractors and third-party providers as part of their onboarding and compliance documentation

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