

**KENSINGTON  
PARK SCHOOL**

**Child Protection & Safeguarding Policy**

Name of Policy:	Child Protection and Safeguarding Policy
ISSRs: NMS:	Part 3: Welfare, health and safety of children Part D: Safeguarding
Government Guidance:	<p><a href="#">Keeping children safe in education 2025</a></p> <p><a href="#">Working together to safeguard children 2023: statutory guidance</a></p> <p><a href="#">Working together to improve school attendance 2024</a></p> <p><a href="#">The Independent School Standards - Guidance for independent schools</a></p> <p><a href="#">National Minimum Standards for boarding schools 2022</a></p> <p><a href="#">Prevent duty guidance: Guidance for specified authorities in England and Wales 2023</a></p> <p><a href="#">Children Missing Education - Guidance for Local authorities</a></p> <p><a href="#">ISI Inspection Handbook Dec 24 MASTER 241209.pdf</a></p> <p><a href="#">Teaching online safety in schools - GOV.UK</a></p> <ul style="list-style-type: none"> <li>• Safeguarding children and young people (Charity Commission Policy Paper, July 2014)</li> <li>• What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)</li> </ul>
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SLT Oversight Responsibility:	Headmaster - A. Faccinello
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<b>Bi Borough safeguarding and child protection training, consultation &amp; advice</b>	<p>Elaine Campbell – Bi Borough safeguarding lead for schools and education, 07712236508 <a href="mailto:elaine.campbell@rbkc.gov.uk">elaine.campbell@rbkc.gov.uk</a></p>
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<b>Initial Contact and Advice Team (ICAT) for accessing a social worker</b>	<p>For children resident in:                  Kensington &amp; Chelsea: 020 7361 3013 (Out of hours – 020 7361 3013)                  Westminster: 020 7641 4000 (Out of hours – 020 7641 6000)</p>
<b>Child Exploitation lead</b>	<p>Emily Harcombe, Child Protection Adviser</p> <ul style="list-style-type: none"> <li>Email: <a href="mailto:eharcombe@westminster.gov.uk">eharcombe@westminster.gov.uk</a></li> </ul>
<b>Tri-borough FGM</b>	<p>Rochelle-Ann Naidoo – Bi-borough Senior Practitioner 020 7641 1610 <a href="mailto:rnaidoo@westminster.gov.uk">rnaidoo@westminster.gov.uk</a></p>

<p><b>Bi-borough PREVENT / Channel Referrals</b></p>	<p>Local team contact                      020 8753 5727 <a href="mailto:prevent@lbhf.gov.uk">prevent@lbhf.gov.uk</a>                      078 1705 4699 <a href="mailto:prevent@westminster.gov.uk">prevent@westminster.gov.uk</a>                      Prevent Programme Manager, Westminster enquiries only Telephone: 020 7641 5071                      Email: <a href="mailto:kmalik@westminster.gov.uk">kmalik@westminster.gov.uk</a></p>
<p><b>Tri-borough multi-agency safeguarding hub (MASH)</b></p>	<p>Karen Duncan - Bi-borough MASH Business Support Officer 020 7641 3991  <a href="mailto:kduncan1@westminster.gov.uk">kduncan1@westminster.gov.uk</a></p>
<p><b>Local Authority Children’s Social Services: Kensington &amp; Chelsea Hammersmith &amp; Fulham Westminster</b></p>	<p>020 7361 3013   <a href="mailto:socialservices@rbkc.gov.uk">socialservices@rbkc.gov.uk</a> 020 8753 6610                      020 7641 4000  <a href="mailto:accesstochildrenservices@westminster.gov.uk">accesstochildrenservices@westminster.gov.uk</a></p>
<p><b>Local Safeguarding Children Board (LSCP) for Kensington &amp; Chelsea &amp; Westminster</b></p>	<p>To be referred to as the Bi-borough LSCP in this document <a href="http://www.rbkc.gov.uk/lscp">www.rbkc.gov.uk/lscp</a></p>
<p><b>Local Safeguarding Children Partnership (LSCP) for Kensington &amp;</b></p>	<p>To be referred to as the Bi-borough LSCP in this document First floor, Kensington Town Hall, Hornton Street, London W8 7NX  <a href="#">Useful Safeguarding Contacts for Professionals   lscp</a></p>

<p><b>Chelsea &amp; Westminster</b></p>	<p>07739 315388 <a href="https://www.rbkc.gov.uk/LSCP/">https://www.rbkc.gov.uk/LSCP/</a></p>
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<p><b>NSPCC</b></p>	<p>0800 800500</p>
<p><b>NSPCC Whistleblowing</b></p>	<p>0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>

<b>Helpline</b>	
<b>NSPCC sexual harassment or abuse in education helpline</b>	0800 136 663
<b>Childline</b>	0800 1111
<b>Samaritans</b>	116 123 jo@samaritans.org
<b>Kidscape Bullying Helpline</b>	0207 730 330
<b>Crimestoppers</b>	0800 555 111
<b>Children's Commissioner for England:</b>	www.childrenscommissioner.gov.uk 020 7783 8330
<b>Disclosure and Barring Service</b>	34 Liverpool Road, Liverpool L693JD 0843 816 6329
<b>Teaching Regulation Agency</b>	Teacher Misconduct, Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT 0207 593 5393 misconduct.teacher@education.gov.uk
<b>OFSTED Safeguarding Children</b>	0300 123 4666 (Monday to Friday from 8am to 6pm) Whistleblowing@ofsted.gov.uk
<b>Independent Schools Inspectorate</b>	0207 6000100 concerns@isi.net

The Bi-borough LSCP (Hammersmith & Fulham, Royal Borough of Kensington & Chelsea, Westminster city Council, Central West Basic Command Unit (Police) and the Integrated Care Board) ensure the coordination of safeguarding work by all agencies. Their multi-agency safeguarding arrangements are set out in the Children and Social Work Act (2017), and monitor the effectiveness of child protection work across the three local authority areas. The LSCP has been operational since 29 September 2019.

## 2. Introduction

Kensington Park School (KPS) is fully committed to the welfare, safety and health of all members of its community and seeks to provide an honest, open, caring and supportive environment. All members of the staff, both academic and other, are expected to recognize the responsibility they can make to safeguard and protect the children at KPS.

All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection. All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm. As a day and boarding school, KPS is aware of the increased vulnerability of children who live away from home. The children's welfare is of paramount importance and we maintain an attitude of "it could happen here".

This policy applies to all staff, advisory board members and visitors to the School and is available to anyone, and the School ensures it is fully implemented. We will ensure that all parents and other working partners are aware of our Child Protection and Safeguarding Policy (Plus the safeguarding appendix document) by mentioning it in our prospectus, displaying

appropriate information at the School's receptions and on the School website, and by raising awareness at meetings with parents.

### **3. Safeguarding Commitment**

KPS adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. Staff encourage children and parents to feel free to talk about any concerns and to see school as a safe place when there are difficulties. Children's worries and fears will be taken seriously by staff and in addition, we provide children with information on who they can talk to outside of school, both within the community and with local or national organisations that can provide support or help.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures for reporting concerns to ensure that children receive effective support, protection and justice.

The School will act on identified concerns and provide early help to prevent concerns from escalating.

A comprehensive Staff Code of Conduct, reflecting the School's values and ethos, outlines our expectations of staff regarding safeguarding. Additional expectations and standards of professional behaviour are detailed in the Staff Handbook. In line with statutory guidance, all staff who work directly with children are required to read and sign to confirm their understanding of Part 1 of the current (2025) Keeping Children Safe in Education (KCSIE). Staff who do not work directly with children may, at the governors' discretion, read Annex A instead. Senior leaders, advisory board members, and the Designated Safeguarding Lead are also required to be familiar with the remaining parts of KCSIE (2025), including Part 2 (Management of Safeguarding), Part 3 (Safer Recruitment), Part 4 (Allegations Against Staff), and Part 5 (Child-on-Child Sexual Violence and Harassment).

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards children must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the School staff and a child or children under 18 is a criminal offence, even if that child is over the age of consent. It is also not permitted for any member of staff in position of trust to engage any form of sexual relationship with a student who is aged 18 or over. In line with the Law this policy defines a child as anyone under the age of 18 years, but in the case of SEND it is anyone under the age of 25 years.

KPS also acknowledges the significant link between mental health and safeguarding, as outlined in KCSIE (2025). Staff are trained to recognize mental health concerns as potential indicators of underlying safeguarding issues, such as abuse, neglect, or exposure to trauma. Children facing mental health challenges, including anxiety, depression, and self-harm, may also be at greater risk of harm. Staff are encouraged to refer children showing signs of mental

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distress to the DSL or DDSL, who will liaise with mental health professionals and the KPS wellbeing team to ensure they receive the appropriate support.

Annex B KCSIE (2025) contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

KPS will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to;
- Ensure that children know that there are adults in the School whom they can approach if they are worried or are in difficulty;
- Include in the curriculum activities and opportunities for PSHE / Citizenship / Relationship and Sex Education and Health Education which equip children with the skills they need to stay safe from abuse (including online and other contexts children are in), and to know to whom they can turn for help;
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- Operate safer recruitment procedures (as outlined in Safer Recruitment Policy available on the website) Including:
  - Ensuring checks meet ISSRs Part 4 and KCSIE (2025) Part 3: identity, enhanced DBS with barred list where eligible, right to work, references, prohibition from teaching, s.128 (management), appropriate overseas checks where an individual has lived/worked overseas, and verification of qualifications.
  - Having regard to the Information Commissioner's Employment Practices Code when conducting online searches.
- The aim of KPS's Child Protection & Safeguarding Policy is Universal Help: To support each young person's development in ways that will foster security, confidence and independence.
- To provide a systematic means of monitoring young people known or thought to be at risk of harm. To emphasise the need for good levels of communication between all members of staff, as between themselves and with senior management.
- Early help and targeted support: To develop a structured procedure within the School which will be followed by all members of the School community in cases of suspected abuse and to foster an environment and culture where those procedures will be readily invoked.
- To further consult with a qualified social worker located in or available to early help services.
- Children in need: To develop and promote effective working relationships with other agencies, especially the police and Social Services. An assessment to be undertaken by a Qualified Social worker and recorded on a case file. Depending on the level of need identified this may result in referral to another service or trigger a child protection investigation.
- Child Protection: To raise the awareness of both teaching and support staff of the need

to safeguard young people who have suffered or are likely to suffer significant harm and of their responsibilities in identifying and reporting possible cases of abuse immediately to Children's Social Care, may result in a child in need or child protection plan.

- To ensure that all adults within our School who have access to children have been subjected to the suitability checks required by the Disclosure and Barring Service and Standard 4 of the Independent School Standards Regulations in respect of their suitability to work with children.

This policy is consistent with:

- KCSIE (September 2025)
- Working Together to Safeguard Children (HM Government, July 2023)
- Independent School Standards Regulations (HM Government, 2014)
- Safeguarding children and young people (Charity Commission Policy Paper, July 2014)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)
- Boarding Schools: National Minimum Standards (HM Government, April 2022)
- Prevent Duty Guidance for England and Wales (HM Government, 2023)
- Children Missing Education (HM Government, 2016)

### 3.1 Terminology

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes
- Working Together to Safeguard Children (2023) states Child Protection as a part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online

**Staff** applies to all those working for or on behalf of the School, full time or part time, in either a paid or voluntary capacity. This also includes parents and advisory board members. Parent refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, stepparents and foster carers.

**Abuse** could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care.

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In line with the SEND Code of Practice and KCSIE (2025), the School uses the term autism.

**A child (or children) is defined as everyone under the age of 18. However, within the context of this policy it also applies to all pupils who are compulsory school aged and students who are engaging in post-16 education including those who have passed their 18th birthday.**

### **3.2 Contextual Safeguarding and Extra Familial Abuse**

KPS is committed to the principles of Contextual Safeguarding, which recognizes that risks to children may extend beyond the family environment. Children may be exposed to risks in peer groups, neighbourhoods, or online. These risks could involve child-on-child abuse, criminal exploitation, gang involvement, or exposure to extremist influences.

The School works proactively to identify and respond to such external threats. Staff are trained to recognize the warning signs of external risks, such as changes in behaviour, unexplained absences, or involvement in risky activities. The DSL will work closely with external agencies, including local authorities and the police, to address these risks and ensure the safety and wellbeing of children.

## **4. Roles And Responsibilities**

### **4.1 General**

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the School. The names of the Designated Safeguarding Lead (DSL) and safeguarding team for the current year are listed at the start of this document.

### **4.2 KPS Advisory Board**

In accordance with the Statutory Guidance within KCSIE (2025) the KPS Advisory Board will ensure that:

- KPS has its own Child Protection & Safeguarding Policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly on the website.
  - All Advisory Board members receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
  - KPS operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, a nominated member of the KPS Advisory Board and other staff involved in the recruitment process have undertaken safer recruitment training.
  - There are procedures for dealing with safeguarding concerns and allegations of abuse against members of staff and volunteers (see Appendix 2). KPS operates a low-level concerns framework (towards adults in school or boarding), alongside statutory allegations procedures (LADO). Records are maintained confidentially and in
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accordance with data protection principles.

- There is a member of the School's leadership team, the Headmaster, who is designated to take lead responsibility for dealing with child protection across the School and boarding house and there is always cover for these roles with appropriate arrangements for before/after school and out of term time activities.
- The DSL undertakes effective Local Authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) using safeguarding briefings etc.
- The Headmaster and all other staff and volunteers who work with children undertake appropriate training which is regularly updated at least annually, (and more comprehensively, every three years in compliance with the Safeguarding Children Partnership protocol); and that new staff and volunteers who work with children are made aware of the School's arrangements for child protection and their responsibilities (including this policy, Part 1 and Annex A of KCSIE (2025), the student Achievement, Behaviour, Rewards and Sanctions Policy and how to respond if children go missing).
- Any deficiencies or weaknesses brought to the attention of the KPS Advisory Board will be rectified without delay.
- The Chair of the KPS Advisory Board (or, in the absence of a Chair, the member responsible for safeguarding) deals with any safeguarding concerns or allegations of abuse made against the Headmaster, in liaison with the Local Authority Allegations Manager (LADO). Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers - "Guidance for Safer Working Practice for those who work with children in education settings (May 2019)". (Supplemented by the COVID-19 Addendum April 2020). Information is provided to the Local Authority (on behalf of the Local Safeguarding Children Partnership) through the Safeguarding Annual Return.
- There is an individual member of the KPS Advisory Board who will champion issues to do with safeguarding children and child protection within the School, liaise with the DSL, and provide information and compliance/monitoring reports to the Governing Body.
- KPS contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" July 2023 including providing a coordinated offer of Early Help for children who require this. This Early Help may be offered directly through school provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the Bi-borough LSCP.
- A termly audit of the Safeguarding Policy is conducted with any issues being addressed promptly. The DSL also delivers a report to the board.

#### **4.3 Headmaster**

The Headmaster will ensure that:

- The policies and procedures adopted by the Governing Body are effectively implemented, and followed by all staff;
  - Sufficient resources and time are allocated to enable the DSL and other staff to
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discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.

- Allegations of abuse or concerns that a member of staff or adult working at School may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer.
- Ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service and cases concerning a member of staff are referred appropriately to the LADO and/or the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) for professional misconduct.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children and Family Specialist Services) or the Police.

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

The responsibilities of the DSL are found in Annex B of KCSIE (2025) and include:

- Implementing and promoting child protection & safeguarding policies and procedures. These are to be reviewed on an annual basis, or as required. A safeguarding audit is to be completed on a termly basis.
  - Acting as the main point of contact for staff, pupils or students, families and external agencies and receiving and acting upon any reported concerns.
  - Liaising with the Headmaster about issues, especially to do with ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This is to include informing the Headmaster of on-going investigations, on-going child protection issues and the welfare of children who are subject to a child protection plan.
  - Liaising with the KPS Advisory Board and the Local Authority on any deficiencies brought to the attention of the board and how these should be rectified without delay.
  - Being fully aware of the Bi-borough LSCP protocols, procedures & threshold documents
  - Liaising with external agencies which may include completing the Common Assessment Framework (CAF). Provide the necessary information for any formal investigations that may take place.
  - Referring of cases to the Channel programme (through the local police PREVENT Engagement Team) where there is a radicalisation concern and also support staff who do this.
  - Acting as a source of support, advice and expertise within the School and liaising with staff on matters of safety and safeguarding (including online and digital safety) and deciding whether to make a referral, by liaising with relevant agencies.
  - Understanding the LADO (Local Authority Designated Officer) role to work effectively with them. Being alert to the specific needs of vulnerable children, especially those with a social worker, special educational needs, a disability, and young carers, and promote
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their educational outcomes by sharing relevant information with teachers, pastoral staff and leaders about welfare, safeguarding and child protection issues. Providing support, advice and guidance to staff on an on-going basis or any specific issue as required.

- Attending and contributing to child protection conferences and other multi- agency safeguarding meetings when required.
  - Ensuring that all relevant contact names and numbers are known to staff and always displayed in an accessible place.
  - Ensuring there is always a member of the safeguarding team available when children are at the boarding house or in School.
  - Monitoring child attendance and liaising with the School nurse about accident logs, concerns raised and incident forms.
  - Ensuring each member of staff has access to and understands the School's safeguarding & child protection policy especially new or part-time staff who may work with different educational establishments.
  - Ensuring all staff have induction training covering: child protection & safeguarding; the Achievement, Behaviour, Rewards and Sanctions Policy; the Anti-bullying Policy, the Online Safety Policy; Whistleblowing Policy and the Staff Code of Conduct. Staff are trained to recognise and report any concerns immediately they arise and are asked to sign that they have read the most recent version of Part 1 of KCSIE and Annex A to those working directly with children.
  - Having up-to-date on-line safety training and ensuring that all staff are aware of this and their other obligations under KCSIE (2025).
  - Ensuring safeguarding team members attend level 3 refresher training courses every two years.
  - Keeping abreast of developments in safeguarding & understanding the latest information on data protection, confidentiality and other legal issues that impact on the protection of children.
  - Ensuring for children leaving School that their child protection file is passed to in the new school/college as soon as possible, ensuring secure transit and confirmation of receipt should be obtained. Information may be communicated in advance to ensure continuity of support and care.
  - Upon receipt of a transferring child's safeguarding file the DSL, ensuring the HOY/DDSL and SENDCo is aware, as required
  - Maintaining and monitoring secure child protection records, including monitoring and acting upon individual concerns, patterns of concerns (e.g., children who repeatedly go missing) or complaints, in accordance with the section on "Records, Monitoring and Transfer" below.
  - Advocating the importance of child protection to parents so they know we have their child's best interest at the heart of our practice.
  - Producing a termly report to the KPS Advisory board.
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#### **4.5 Deputy Designated Safeguarding Leads (DDSLs)**

DDSLs, must be appropriately trained and, in the absence of the Designated Safeguarding Lead, carry out those functions necessary to ensure the ongoing safety and protection of children.

In the event of the long-term absence of the designated person, a DDSLs will assume all of the functions above.

Their responsibilities include:

- Adhering to the three Safeguarding Partners (LSCP), Local Authority and School procedures with regard to referring a child if there are concerns about possible abuse.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely and are separate from general children records.
- Ensuring that an indication of further record-keeping is marked on children's records.
- Ensuring that the first day of absence contact is made with the family or guardian of any child who is absent from School.
- Ensuring that any child not on the child protection register who is absent from School without explanation for 10 days is then subject to contact from the School's safeguarding team. Ensuring that any child currently on the child protection register who is absent from School without explanation for two days is referred to Social Services. In such a case, where the child has not attended the first lesson, contact is made as soon as possible to find out what explanation is given for absence.

### **5. Sharing Of Information**

#### **5.1 Records, Monitoring and Transfer**

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the School. Records of concerns are entered into CPOMS and the Designated Safeguarding Lead and relevant safeguarding team are alerted. The Designated Safeguarding Lead is responsible for deciding at what point these records should be shared with other agencies (in accordance with the Data Protection Act 2023 and GDPR principles).

Child protection records are stored securely within CPOMS, with access confined to specific staff, i.e., Designated Safeguarding Lead / Headmaster (and relevant deputies). Weekly safeguarding meetings at the Senior School, 6th Form and boarding make sure that any patterns or concerns about individuals are monitored and actions are taken as required.

When children transfer schools, their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records via email encryption and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving school, 6th Form or FE college, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. Transfer will be undertaken as soon as possible and in any event within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives.

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Where a child needs specific ongoing support relevant information will be transferred prior to the child arriving at their new school. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g Police should also be made available.

Data protection: Written safeguarding records count as “sensitive personal data” under the General Data Protection Regulation and Data Protection Act (HM Government, 2023): they neither prevent nor limit the sharing of information for the purposes of keeping children and young people safe. As such, there is not a barrier to sharing information, and the duty to safeguard children overrides data protection obligations; however, parents who ask to see records may be allowed access, provided this does not put children at risk and that any questions of the child’s consent are satisfied.

## 5.2 Safeguarding in the Curriculum

Planned PSHE and Relationships Education, Relationships and Sex Education and Health Education include a number of safeguarding issues as set out in the DfE statutory guidance. This is appropriate to the child’s age and stage of development. It is also underpinned by the School’s Achievement, Behaviour, Rewards and Sanctions Policy and pastoral support system. Such topics include:

- Bullying / Cyberbullying (*The Anti-bullying Policy* is located on the KPS School website)
- Drugs, alcohol and substance misuse (including awareness of County Lines and the Criminal Exploitation of Children)
- Online safety: the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalize other people, especially children, young people and vulnerable adults.
- The danger of meeting up with strangers
- Staying safe
- Fire and water safety
- Road safety
- Domestic Abuse
- Healthy Relationships / Consent
- (so called) Honour Based Abuse issues e.g., forced marriage, Female Genital Mutilation (FGM)
- Sexual exploitation of children (CSE), including online
- Child Criminal Exploitation
- Preventing Extremism and Radicalisation
- E-Safety and Cyber Crime
- Generative AI and Deepfakes
- Misinformation, disinformation and conspiracy theories

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Children are taught how to behave in a responsible manner and respect each other in order to

minimize the risk of child-on-child abuse. Children are also reminded regularly about E-Safety and tackling bullying procedures. The School continually promotes an ethos of respect for others and children are encouraged to speak to a member of staff/ trusted adult in confidence about any worries they may have. The School community will also:

- make sure that child protection checks and procedures apply to any staff employed by another organisation working within the School or on another site (see Trips and School Educational Visits Policy)
- ensure that all young people know there is an adult in the School whom they can approach if they are worried or in difficulty
- ensure that all young people know there is an Independent Listener, not connected to the School, who they can contact without the requirement to pass on information to the School, unless it is of a safeguarding nature

KPS has implemented robust filtering and monitoring systems to safeguard children from harmful online content, including extremism, cybercrime, and online grooming. The DSL has been trained in understanding and identifying the risks. Regular collaboration between safeguarding leads and the IT department ensures ongoing assessment of potential threats and the efficacy of these systems. Notifications are set up to act as immediate alerts, monitored through a dedicated inbox. The School uses 'Smoothwall' filtering to prevent access to inappropriate materials and monitors children's online activity. Staff, parents, and children will receive updated training on online risks, focusing on emerging threats and preventive measures

Further detail of the School's approach to online safety can be found in the School's **Online Safety Policy** to ensure that children are safe when accessing the internet through the School's systems.

## **6. Contextual Challenges**

### **6.1 Children who Board and Boarding-Specific Safeguarding Considerations**

The boarding environment presents unique contextual challenges that require heightened vigilance and a proactive safeguarding culture from staff. Children live away from home for extended periods, often alongside peers from diverse backgrounds, cultures, and age groups. This increases the importance of close supervision, consistent routines, and clear expectations for behaviour and conduct. Risks may arise from shared living spaces, increased opportunities for unsupervised interaction, homesickness, relationship pressures, and the emotional impact of being separated from family. Staff must remain alert to changes in mood, peer dynamics, and patterns of behaviour that may signal emerging concerns. Strong communication between boarding staff, teaching staff, the wellbeing team, and families is essential to ensuring that every child feels safe, supported, and able to thrive within the boarding community

KPS recognises the additional factors relevant to safeguarding boarders. These include risks related to inappropriate pupil relationships, the potential for child-on-child abuse, and safeguarding concerns associated with children sharing overnight accommodation. KPS's approach to harmful online content and how boarders' devices are managed when brought into the School is detailed in the School's Acceptable Use Policy, which applies to both day and boarding children. This includes provisions for device registration, monitoring, and filtering. Further information regarding safeguarding provisions in boarding can be found in the

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following documents available on the KPS website:

- ***Boarders' Handbook***
- ***Missing Student Policy***
- ***Supervision Policy***

Where educational guardians/host families are used, the School follows NMS Standard 22: robust safer recruitment and vetting, ongoing monitoring, and immediate action if concerns arise. This use of AEGIS accredited guardianship agencies is adopted by KPS as good practice. KPS adheres to the BSA Safeguarding Charter and will report safeguarding matters to the BSA as required.

## **6.2 Children with Special Educational Needs and Disabilities (SEND)**

Children with SEND face additional vulnerabilities that require heightened vigilance. KCSIE (2025) highlights the importance of staff training to identify and respond to the unique risks affecting these groups. KPS understand that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

The SEN department works with these children and extra support is also given by staff.

## **6.3 Looked After Children (LAC)**

A Looked After Child is a child who is looked after by a local authority, subject to a care order, or who is voluntarily accommodated by a local authority. The most common reason for children being defined as LACs is as a result of abuse and / or neglect. Staff are briefed appropriately and the School will work with local authority as required in such cases.

The DSL alongside the Head of the Senior School works with the Headmaster to support looked after, previously looked after and children in kinship care, ensuring Personal Education Plans and pupil premium arrangements are effective.

## **6.4 Private Fostering Arrangements**

Where a child under 16 (or 18 with a disability) is living with someone who is not their family or a close relative for 28 days or more, staff inform the Designated Safeguarding Lead so that a referral to Children's Social Care for a safety check, can be made. (A close relative includes step-parent, grandparents, uncle, aunt or sibling).

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## **6.5 Children who are Lesbian, Gay, Bi or Trans (LGBTQI+)**

The fact that a child or a young person may be LGBTQI+ is not in itself an inherent risk factor for harm. However, children who are LGBTQI+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQI+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQI+.

Risks can be compounded where children who are LGBTQI+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Staff are trained to provide a safe and inclusive environment where these children feel supported and confident to report concerns. Ongoing training and awareness programs will help mitigate risks and foster a culture of acceptance for LGBTQI+ children

### **6.5.1 Risk Awareness Children who are LGBTQI+ can be targeted by their peers, leading to potential risks and harm.**

- Children who are perceived to be LGBTQI+, whether they identify as such or not, can be equally vulnerable. Staff should recognise and address these vulnerabilities accordingly.

### **6.5.2 Procedures:**

- Staff members should provide a safe and inclusive environment for children who are LGBTQI+, ensuring they have trusted adults with whom they can openly communicate and share concerns.
- Staff should strive to reduce additional barriers faced by children who are LGBTQI+, fostering an environment where they feel comfortable speaking out and seeking support from staff members.

## **6.6 Children in Care**

### **6.6.1 Procedures:**

- KPS will provide additional support during times of transition for children in care, such as changing placements or transitioning to post-care arrangements.
  - Individual support plans will be developed in collaboration with the child, their carers, and relevant agencies to address their specific needs and promote their educational progress.
  - Designated staff members will work closely with the local authority and other relevant professionals to coordinate support services and ensure effective communication channels.
  - Regular review meetings will be held to monitor the progress and well-being of children in care, involving all relevant parties, including the child, their carers, social services, and School staff.
  - KPS will provide access to counselling services or other forms of emotional support to help children in care cope with any emotional challenges they may experience.
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## **6.7 Children with Parents in Prison**

### **6.7.1 Procedures:**

- Staff members will handle information regarding a child's parent's imprisonment with utmost sensitivity and confidentiality, ensuring it is shared only on a need-to-know basis
- KPS will strive to create a supportive environment where children with prison parents feel safe, included, and understood. Staff members will receive training to better understand their needs and provide appropriate support
- KPS will establish effective communication channels with prison welfare teams or relevant authorities to exchange necessary information and ensure the well-being of children with prison parents
- Individualised support plans will be developed in collaboration with the child, their carers, and relevant professionals to address any specific needs arising from having a parent in prison
- KPS will ensure that children with prison parents are not subjected to discrimination or stigmatisation and promote an inclusive and empathetic environment.

## **6.8 Child Homelessness**

### **6.8.1 Objective:**

The objective of this policy segment is to provide support and assistance to children who are experiencing homelessness or unstable housing situations.

Policy Statement:

KPS acknowledges the challenges faced by children who are homeless or living in unstable housing situations. We are committed to identifying and supporting these children, ensuring their access to education and safeguarding their well-being.

### **6.8.2 Procedures:**

- KPS will establish procedures to identify and assess children who are homeless or living in unstable housing situations, working in collaboration with relevant agencies and support services.
  - Designated staff members will be responsible for coordinating support services and liaising with external agencies to address the specific needs of children who are homeless.
  - KPS will provide additional educational support, including access to resources, counselling services, and pastoral care, to ensure the holistic well-being and academic progress of children experiencing homelessness.
  - Information regarding a child's housing situation will be handled with utmost confidentiality and sensitivity, respecting their privacy and promoting a non-judgmental environment.
  - KPS will collaborate with external agencies, such as local authorities, housing services,
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and community organisations, to provide comprehensive support and resources to children experiencing homelessness.

- KPS will work closely with relevant authorities to facilitate regular school attendance and ensure that children experiencing homelessness have access to appropriate educational opportunities.

### **6.9 Online Filtering and E-Safety**

Staff should be aware of the need for the safeguarding of children online. Please refer to the School's Online Safety Policy This policy has been created to align with DfE Filtering and Monitoring Standards for schools and colleges.

KPS recognises the content risk category now explicitly includes **misinformation, disinformation and conspiracy theories** (KCSIE (2025)); our curriculum, assemblies and tutor times address critical evaluation of online information and reporting routes.

The **Online Safety Policy** describes the School's expectations for the use of mobile phones, cameras and other digital recording devices e.g. i-Pads. In the Senior School children are not allowed to use phones unless they have specific permission from a member of staff. There is Smoothwall regulation in all 3 sites: Senior School, Sixth Form and Boarding.

The **Online Safety Policy** gives guidance about how to support about children accessing the internet whilst they're at School using data on their phones. VPN's are explicitly disallowed under the student code of conduct.

The use of "Blended Learning" within the School requires an understanding of how to follow correct safeguarding procedures when teaching through the consequences of the COVID-19. The School has referred to the following links and will implement blended learning when deemed necessary.

Remote education good practice - GOV.UK ([www.gov.uk](http://www.gov.uk))

Safeguarding and remote education during coronavirus (COVID-19) - GOV.UK ([www.gov.uk](http://www.gov.uk))

Review your remote education provision - GOV.UK ([www.gov.uk](http://www.gov.uk))

Communications with parents and carers will be used to reinforce the importance of children being safe online and what systems the School uses to filter and monitor online abuse. We will inform parents and carers what their children are being asked to do online, including the sites they will be asked to access and who from the school their child is going to interact online.

### **Policy Statement**

KPS has embarked on a comprehensive approach to provide greater clarity regarding the roles of our diverse educational staff members and the specific responsibilities concerning online filtering and monitoring.

#### **6.9.1 Online Monitoring Responsibilities:**

Within KPS, our DSL, and DDSLs are pivotal figures in ensuring the safety of our children in the digital landscape. They are entrusted with the critical responsibility of fully comprehending our School's implemented filtering and monitoring systems. This goes beyond mere awareness; it involves an in-depth understanding of the intricacies of these systems, including their capabilities and limitations. Our DSL and DDSLs are well-versed in the types of websites and

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online content that children may encounter.

To safeguard against potential risks, our DSL and DDSs are not only well-trained but also engage in ongoing collaboration with our IT teams to continuously assess the effectiveness and relevance of these systems. Regular reviews and updates ensure that our children are protected against emerging online threats.

### **6.9.2 Staff Induction**

The induction process at KPS is a pivotal juncture for new staff members. It is during this period that they are introduced to our School's distinctive approach to safeguarding and child protection, including online safety. In our commitment to ensuring every staff member is well-prepared, we meticulously integrate information concerning expectations, relevant roles, and responsibilities related to filtering and monitoring. Our induction program includes practical training sessions and workshops that equip staff with the knowledge and tools necessary to protect our children online. This includes hands-on experience with our filtering and monitoring systems, ensuring that staff are not only aware of their role but also confident in executing it effectively.

### **6.9.3 Smoothwall Functionality**

KPS recognises that providing a safe online environment is a multifaceted endeavour. Filtering and monitoring are implemented in line with DfE "Filtering and monitoring standards for schools and colleges". The DSL and Senior Leadership Team maintain an operational understanding of the systems, receive and review alerts, and work with IT to ensure prompt blocking, escalation and record keeping. The School's approach explicitly manages risks from Generative AI (e.g. harmful prompts, deepfakes, image-based abuse, data leakage KCSIE (2025)) through technical filtering, staff training, and pupil education, and by applying the DfE's wider digital and technology standards. A termly report on filtering/monitoring effectiveness and incidents is provided to the Advisory Board, with immediate escalation for serious harm. KPS take the time to provide a comprehensive explanation of how our Smoothwall system operates to staff and children. Smoothwall is more than just a software; it is a critical component of our online safety strategy. We educate all users about the specific features and functionalities of Smoothwall designed to protect against online risk and harm. This includes real-time monitoring, content filtering, and reporting mechanisms. Our staff are trained to utilize Smoothwall as a proactive tool in safeguarding our children, and they understand how to respond swiftly and effectively to any incidents or concerns that may arise.

KPS maintains cybersecurity resilience proportionate to its risk profile, including secure access controls, incident response and contingency plans to sustain safeguarding operations during cyber incidents (e.g. offline safeguarding logs and contact trees KCSIE (2025)).

## **7 Child Absence or Missing from Education**

At KPS, we place paramount importance on understanding the implications of a child's absence or disappearance from our educational environment. This understanding is not just theoretical; it is an integral part of our safeguarding strategy.

### **7.1 Attendance Monitoring**

Attendance is managed in line with "Working together to improve school attendance" (2024 - statutory) and the DSL is also the KPS 'Attendance Champion'. Persistent or concerning

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absence is treated as a safeguarding risk, triggering early help or referral to children's social care where appropriate. First day calling is mandatory and patterns are reviewed at least fortnightly by the DSL and Heads of Year. KPS maintains a rigorous attendance monitoring system that goes beyond record-keeping. We view attendance as a key indicator of a child's well-being and safety. Our dedicated attendance champions actively track and document child attendance on a daily basis. This system is designed to promptly identify any irregularities, such as unexplained absences or prolonged periods of absence. In the event of such anomalies, our safeguarding team initiates a thorough investigation to ascertain the wellbeing of the child. This includes contacting parents or guardians to verify the reasons for the absence and, if necessary, involving external agencies such as social services or the police. By maintaining a proactive and diligent approach to attendance monitoring, we ensure that children who are missing from education are identified and supported in a timely and appropriate manner.

## **8. Pre-Recruitment Checks**

KPS is deeply committed to the safety and well-being of our children, and we ensure in our efforts to maintain the highest standards of safeguarding, even before a candidate becomes a member of our staff. For further information on our pre-recruitment checks, please view our Safer Recruitment Policy

### **8.1 Online Searches**

Our recruitment process is built upon principles of transparency and accountability. We believe that safeguarding begins with the recruitment of individuals who share our commitment to child welfare. To align with the KCSIE (2025) guidance, we communicate clearly and explicitly to all job applicants that online checks are a standard procedure as part of our due diligence checks before interviews. We want candidates to fully understand the importance of these checks in our commitment to safeguarding, and we encourage open dialogue about any concerns or questions they may have. By providing this clarity from the outset, we ensure that candidates are fully informed and prepared for any relevant inquiries during the interview process.

## **9. Handling Allegations Involving School Premises Usage**

KPS recognises that allegations made against external organizations or individuals utilizing our premises for various purposes demand a careful and diligent approach. Our procedures for handling such allegations are designed to protect our children and maintain the integrity of our safeguarding practices.

### **9.1 Adherence to Safeguarding Policies**

We rigorously adhere to our established safeguarding policies and procedures, which have been carefully crafted to address a wide range of scenarios, including allegations against external parties. When an allegation is made, regardless of the source, we initiate a thorough and impartial investigation. This investigation involves gathering all relevant information, interviewing witnesses, and collaborating with external agencies as necessary. We maintain open lines of communication with the Local Authority Designated Officer (LADO) to ensure that our response aligns with statutory requirements. In cases where an allegation is substantiated,

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we take swift and appropriate action to protect our children and ensure their well-being. This may include suspending or terminating arrangements with external organisations or individuals found to be involved in safeguarding concerns.

#### **10. Level 4 Concerns: Children at Risk of Significant Harm, Abuse and Neglect**

Level 4 is the highest level of need as defined by section 47 of the Children Act (1989) At this level; children are either suffering or are at risk of suffering significant harm. It is caused when a child's health or development is seriously or permanently damaged. Inflicting significant harm, or failing to act to prevent it, is a definition of child abuse and neglect.

To ensure that our children are protected from significant harm, we need to understand what types of behaviour constitute abuse and neglect.

**“Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children”. (KCSIE (2025))

##### **10.1 Types of Abuse**

All School and boarding staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

##### **10.2 Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

##### **Indicators of abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

**A child who is being abused or neglected may:**

- have bruises, bleeding, burns, fractures or other injuries
  - show signs of pain or discomfort
  - keep arms and legs covered, even in warm weather
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- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless regarding their own or other's safety
- self-harm
- be isolated, withdrawn or depressed
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.
- Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report their concerns – they do not need 'absolute proof' that a child is at risk.**

**Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".**

### **10.3 Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators include:

Children:

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- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Lack of confidence / self-esteem;
- Sudden speech disorders;
- Self-harming;
- Extremes of passivity and / or aggression;
- Compulsive stealing;
- Drug, alcohol, solvent abuse;
- Fear of parents being contacted;
- Unwillingness or inability to play; and
- Excessive need for approval, attention and affection.
- Parents or carers
- Parents or carers who withdraw their attention from the child, giving the child the “cold shoulder”;
- Blaming their problems on their child;
- Humiliating their child, for example, by name-calling or making negative comparisons;

#### **10.4 Sexual Abuse**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening or not. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Indicators include:

- Children who display knowledge or interest in sexual acts inappropriate to their age;
  - Children who use sexual language or have sexual knowledge that you would not expect them to have;
  - Children who ask others to behave sexually or play sexual games;
  - Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy;
  - Children who have sudden changes in behaviour and school performance;
  - Children who self-harm, self-mutilation or attempts at suicide;
  - Children who allude to secrets which they cannot reveal;
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- Children who have a tendency to cling or need constant reassurance; and
- Children with a fear of undressing for gym activities.

### **10.5 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Child sexual exploitation and child criminal exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Indicators for sexual exploitation (CSE) include:

- Children who appear with unexplained gifts, money or new possessions;
- Children who associate with other young people involved in exploitation; Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or do not take part in education; and
- Children who present with depression or are withdrawn.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point or are targeted by criminals involved in the illegal supply of drugs (County Lines) and serious violent crime. 'County Lines' involves drug networks or individuals exploiting children and young people into carrying drugs and money between cities, towns and villages. Serious violent crime can be associated with this form of criminal activity together with child sexual exploitation.

Children may also be exploited into committing cybercrime or money laundering offences and organised criminal groups or individuals may exploit children and young people with enhanced computer skills to access digital networks and/or data for criminal and financial gain. Children with bank accounts may be persuaded to allow criminals to use their banking facilities to launder money.

Criminal exploitation of children is a form of harm that can affect children in both a physical environment and online.

Staff training includes raising awareness that under the Sexual Offences Act (2003), it is an "abuse of a position of trust", and thus a criminal offence, for someone working in a school to "groom" or engage in sexual activity with a student of any age, and in cases where the student

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is over 18, the agreement of his or her parents is irrelevant. Staff should also note that, under the Serious Crime Act (2015), it is now a criminal offence for an adult to communicate with a child under 16 if the communication is sexual or intended to elicit a response that is sexual.

Any concerns should be passed to the DSL who will pass on the information to the LADO and police.

### **County Lines:**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE (2025)) may also be applicable to children involved in county lines. The School is alert to the signs and will work with local agencies where children are suspected to be involved. If trafficking is suspected, the School will consider a referral to the National Referral Mechanism.

## **10.6 Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators include:

- Children who are living in a home that is indisputably dirty or unsafe;
  - Children who are left hungry or dirty;
  - Children who are left without adequate clothing, e.g.: not having a winter coat;
  - Children who are living in dangerous conditions, i.e.: around drugs, alcohol or violence;
  - Children who are often angry, aggressive or self-harm;
  - Children who fail to receive basic health care;
  - Parents who fail to seek medical treatment when their children are ill or are injured;
  - Children who have poor personal hygiene;
  - Children who are frequently tired;
  - Children who are frequently late / non-attendance at school;
  - Children who have a poor relationship with peers;
  - Children who are compulsively stealing and scavenging;
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- Children who run away;
- Children with a loss of weight / being constantly underweight;
- Children who have low self-esteem; and
- Children with poor dental hygiene.

### **10.7 Children and Exploitation**

Children can be vulnerable to various forms of exploitation, both within and beyond the school environment, and it is essential that staff remain vigilant to the signs and risk factors associated with these harms. Exploitation can take many forms, including criminal exploitation, sexual exploitation, financial manipulation, online grooming, coercive peer influence, and the misuse of digital platforms. Some students may present with additional vulnerabilities due to age, developmental stage, special educational needs, family circumstances, or unmet emotional needs. Staff must be alert to changes in behaviour, unexplained absences, secretive online activity, increased risk-taking, or associations with older individuals or unfamiliar peer groups. Early identification, clear reporting procedures, and strong multi-agency partnerships are crucial in safeguarding students and ensuring timely, appropriate intervention to prevent exploitation and protect children from harm.

### **10.8 Children Missing from Education**

KPS recognises the entitlement that all children have to education and will work closely with the local authority to share information about children who may be missing out on full time education or who go missing from education.

The local authority will also be informed where children are to be removed from the school register

- to be educated outside the school system;
- for medical reasons;
- because they have ceased to attend;
- because they are in custody;
- because they have been permanently excluded.

We also recognise that when children go missing this is a sign that they may have been targeted by perpetrators of Child Sexual Exploitation and/or drug related criminals (County Lines). Children may also be groomed into participating in other forms of criminal exploitation including cybercrime, serious violence and violent crime. Children who attend an alternative education provision or have an agreed reduced timetable are more likely to be vulnerable to these forms of exploitation.

The DSL will monitor any unauthorised absence and will be particularly cautious if a child goes missing on repeated occasions. The School's **Attendance and Lateness Policy** including child missing from education procedure outlines the procedures to be followed by staff if a child cannot be accounted for at any time.

### **10.9 Radicalisation & Preventing Extremism**

KPS recognises the School's duty (the Prevent duty), placed on us by the Counter Terrorism Bill (July 2015), to prevent our children being drawn into terrorism and / or extremism and "Revised Prevent Duty Guidance: for England and Wales" July 2015. It recognises that during the

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radicalisation process it is possible to intervene and prevent people from being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer to their psychological or emotional problems. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

KPS is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The children are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

We recognise that there is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism. Staff should be aware of changes to behaviour or conversations that might indicate that a child is becoming involved in radicalisation. All staff are trained on Prevent awareness and advice can be sought from the DSL.

The School is also aware that the Internet remains a significant risk in terms of the propagation of extremist views. ISIS, in particular, has shown itself to be adept at using social media as a tool to groom and manipulate young people. The School has Smoothwall filters on its computers which generates a daily report to a nominated member of the safeguarding team to check, as it is acknowledging that children may have legitimate reasons for researching terrorism.

All external speakers will need to submit a detailed summary of the content of their speech in advance of any presentation to children to the Headmaster, who may decide that that material to be presented is not appropriate for the audience. Children should be exposed to a range of views, but it is incumbent on the School to ensure that both sides of any argument receive an equal hearing, whether this in assemblies, form time or presentations from external speakers.

KPS will work with external agencies including the police, LSCP / LSCP and Westminster City Prevent and Channel teams who will share this information with the police. Parents will also be included in the process, as appropriate.

**Immediate threats:**

If you have seen a person acting suspiciously or if you see a vehicle, unattended package or bag which might be an immediate threat, move away and call 999 without delay.

**No immediate threat:**

If you are concerned about terrorist activity or risk of radicalisation and there is no immediate threat, you can refer the individual for support by contacting one of the following:

- Police on 101
  - Anti-Terrorist Hotline on 0800 789 321
  - Hammersmith & Fulham and Kensington and Chelsea Prevent Team:
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- Telephone: 020 8753 5727
- Shared inboxes: prevent@lbhf.gov.uk and prevent3@rbkc.gov.uk
- Westminster Prevent Team:
- Telephone: 020 7641 6032
- Email: prevent@westminster.gov.uk

**A risk assessment is contained in Annex B Indicators include:**

- A conviction that their religion, culture or beliefs are under threat and treated unjustly;
- A tendency to look for conspiracy theories, and a distrust of mainstream media;
- A sense of debt or guilt; Blaming parents for family problems;
- Feeling let down, and perhaps 'religious seeking';
- Peer pressure, low self-esteem, and/or the need for identity and belonging;
- Physical change / growth spurt (being bigger than peers);
- Being secretive about who they have been talking to online and what sites they visit;
- Switching screens when you come near the phone, tablet or computer;
- Possessing items – electronic devices or phones – you have not given them; and
- Becoming emotionally volatile.

**10.10 Honour-Based Abuse (HBA) including Female Genital Mutilation (FGM) and Forced Marriage**

Honour-based abuse (HBA) encompasses crimes that have been committed to protect or defend the honour of the family and / or community. All forms of HBA, for example FGM and forced marriage, may involve a wider network of people.

Female Genital Mutilation Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18 or where a girl discloses that she has undergone FGM.

KPS's response to FGM will consider the government guidance, "Multi-agency statutory guidance on female genital mutilation" updated October 2018. Staff will also follow the established safeguarding procedure by reporting any such concerns of either the disclosure by the victim or visual evidence) to the DSL and a report must also be made to the Police (this is a statutory duty). A multi-agency approach will be taken liaising with the local authority, the Integrated Care Board and the police (the safeguarding partners).

There will be a considered safeguarding response towards any girl who is identified as being at risk of FGM (e.g. there is a known history of practicing FGM in her family, community or country of origin) which may include sensitive conversations with the girl and her family, sharing information with professionals from other agencies and/or making a referral to Children's Social Care.

If the risk of harm is imminent there are several emergency measures that can be taken including police protection, an FGM protection order and an Emergency Protection Order.

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### 10.11 Child-on-Child Abuse

KPS recognises the growing concern of harmful sexual behaviour (HSB), which is included in the broader category of child-on-child abuse. The School also recognises the risk of child-on-child abuse is heightened due to the schools unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation.

We are aware that children (young people under the age of 18) are capable of physical, sexual or emotional abuse to other children. Harmful sexual behaviour can occur both online and offline and may involve coercion, manipulation, or other inappropriate sexual behaviours. This includes, but is not limited to, sexual violence, sexual harassment, up skirting, initiation/hazing, and Youth Produced Sexual Imagery. Staff will receive specific training to recognize, report, and respond to HSB. Such abuse is unacceptable and will not be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

All incidents will be handled sensitively, and appropriate support will be provided to both the victim and the alleged perpetrator. Parents or carers of the children involved will be informed as soon as it is appropriate to do so. Serious cases will be referred to external agencies such as the police or social services. All reported cases of HSB will be monitored, and action will be taken to prevent escalation.

There are school and local authority or Safeguarding Children Partnership guidance and policies which detail the School’s procedures to address and minimise these concerns including:

- ***Achievement, Behaviour, Rewards and Sanctions Policy***
- ***Anti-bullying Policy***
- ***Online Safety Policy***

Where an incident has occurred or specific risks are identified, the details will be added to an CPOMS record for the children concerned and an investigation conducted by the DSL/Head of School/Headmaster in line with KPS policy and procedure.

All incidences of bullying, including cyber-bullying and prejudice-based bullying must be reported to the DSL who will make a professional judgement whether or not the incident has reached the threshold for a child protection issue. If it has not the issue will be managed by the School welfare / pastoral meeting system and tutor.

A bullying incident will be treated as a child protection concern where there is a concern, or possible concern, that a child has suffered, is suffering, or is likely to suffer significant harm. The School uses PSHE lessons to discuss triggers that may lead to Child-on-Child abuse and how this may be prevented.

Indicators include:

- Failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect;
  - Physical injuries;
  - Having difficulties with mental health and / or emotional wellbeing;
  - Becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much;
  - Drugs and / or alcohol use
  - Changes in appearance and / or starting to act in a way that is not appropriate for the child’s age;
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Children who have:

- witnessed or experienced abuse or violence themselves;
- suffered from the loss of a close family member or friend; or
- experienced considerable disruption in their lives.

## **10.12 Sexual Violence and Sexual Harassment**

Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003 including rape and sexual assault. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and may include sexual name-calling, taunting or "jokes" and physical behaviour, for example, deliberately brushing against someone or interfering with clothes. It can occur by adults or child on child. These issues are often very complex and may require support from the LADO & Police, as necessary.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

'Upskirting' is also a criminal offence (under the Voyeurism (Offences) Act 2019) and typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing in order to obtain sexual gratification or to cause humiliation, distress or alarm (anyone of any gender can be a victim).

The following situations are very clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16) and sexual intercourse without consent is rape (as defined in law)

Evidence shows that girls, children with SEND and LGBTQI+ children are more likely to be the victims of sexual violence and harassment and boys are more likely to be the perpetrators. However sexual violence and sexual harassment can occur between children of any gender. Where there is a report of sexual violence, the DSL must make a quick risk assessment and keep this under review. This must consider:

- The victim, especially their protection & support
- The alleged perpetrator
- All other children, staff or adults at the School, if in need of protection.

Careful consideration must be given about how the investigation will be made and external agencies will be contacted as required. The perpetrator will be removed from classes shared with the victim while the facts are being established. One of four courses of action will be taken:

- Internal managing, in cases where for example sexual harassment is a one-off incident
  - Early help, for example stopping non-violent sexual behaviour from being escalated.
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- Referral to children's social services, where there is an immediate risk
- Reporting to the police, for example in cases of rape, assault by penetration or sexual assault.

It is important that the School should record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it. For further guidance KPS follows the guidance contained in KCSIE (2025).

The guidance covers: It covers what sexual violence and harassment is, schools' and colleges' legal responsibilities, a whole school or college approach to safeguarding and child protection and how to respond to reports of sexual violence and sexual harassment

All such incidents should be immediately reported to the DSL or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the School's pastoral system.

A bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Decisions will be made on a case-by-case basis, with the DSL taking a leading role, supported by other agencies such as the police, social care and parents as appropriate. Support will be offered to both the alleged victim(s) and the child(s) accused. Parents will be included in discussions about the format that this support will take.

### **10.13 Youth Produced Sexual Imagery**

Creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves. Youth Produced Sexual Imagery is defined as "sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet"

For such incidences

- Inform the DSL as soon as possible
- Support the children involved as appropriate and in accordance with their best interests
- Inform all parents of involved children unless by doing so you put a child at risk
- Images will not be viewed by School staff
- If the School is to deal with the matter, involve parents in ensuring the images are deleted.
- If there is evidence of exploitation, blackmail or the deliberate targeting of a vulnerable child, inform the police.

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people.

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#### **10.14 Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. We encourage any child who is subjected to or witnesses domestic abuse to come forward and receive the support they need.

Children who witness or are victims of domestic abuse are at high risk of suffering trauma, which can manifest in behavioural changes, anxiety, or aggression. Staff will receive specific training on recognizing the signs and symptoms of domestic abuse and will work closely with external agencies to provide necessary support

#### **10.15 Self-Harm**

This includes children cutting themselves, eating disorders and substance abuse. Self-harm can occur in many forms and is often a sign of underlying distress, unmet emotional needs, or difficulty coping with overwhelming feelings. Young people may engage in self-harm as a way to manage anxiety, trauma, low self-esteem, or challenging life events, and it may be hidden or disclosed only to trusted peers. Staff must remain attentive to physical signs, changes in mood or behaviour, withdrawal from activities, use of covering clothing, or indications from peers that a student may be struggling. It is essential that concerns are responded to promptly, sensitively, and without judgement, following the School's safeguarding procedures. Creating a safe, supportive environment where students feel able to talk, alongside strong communication with parents and relevant agencies, is vital in ensuring that students receive appropriate emotional support and professional intervention when needed.

#### **10.16 Serious Violence**

Indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and bring this matter to the attention of the DSL, who will consult with the local authority and police as appropriate.

#### **10.17 UKVI and Visa Sponsored Children**

If a child holding a Child/Student visa sponsored by the School goes missing, the School will notify UK Visas and Immigration (UKVI). If the pupil misses ten consecutive expected contact points, considered to be unauthorised, then the School would consider further action. Each completed attendance register is treated as a contact point.

Reporting will be conducted by the School's Level 1 user via the Sponsor Management System in accordance with current UKVI guidance.

#### **10.18 Elective Home Education (EHE)**

KPS is committed to safeguarding the welfare of all its children, including in circumstances where parents express an intention to educate their child at home.

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While parents have the right to choose to educate their child at home, elective home education (EHE) can be a significant decision and may have safeguarding implications—particularly where the child has a social worker, special educational needs and/or disabilities (SEND), or is otherwise vulnerable.

Where a parent indicates the intention to home educate their child, KPS will engage with the local authority and relevant professionals to hold a meeting with the family, ideally before withdrawal occurs. This is especially important where a child has SEND, is considered vulnerable, or has a social worker.

Where a parent notifies the School of their intention to withdraw a pupil for elective home education, the School will:

- Aim to coordinate a meeting with the parents and the local authority (LA), withdrawal is confirmed.
- Seek to understand the reasons for the decision and ensure that it is being made in the best interests of the child.
- Consider whether the child is known to social care or has an allocated social worker, and if so, ensure that they are included in any multi-agency discussion.
- In line with safeguarding duties, share relevant information with the LA to support their decision-making and safeguarding processes.

This collaborative approach allows all parties to explore whether home education is suitable and to mitigate any safeguarding risks associated with the child being removed from the school environment.

Where there are concerns that EHE may be used to avoid safeguarding oversight or may place the child at risk of harm, the DSL will:

- Make a referral to children's social care if appropriate.
- Ensure that all actions are recorded in line with the School's safeguarding record-keeping

### **11. Level 3 Concerns: Children in Need**

At this level, which is defined by Section 17 of the Children Act (1989), a child is not immediately at risk, but his or her needs are already regularly unmet, and without the intervention of specialist support services working in partnership with the family, the child's situation will probably deteriorate still further.

Critical factors on deciding whether a child is in need are:

- What will happen to a child's health and development without services being provided?
- The likely effect the service will have on the child's standard of health and development.

Such children are at risk of moving onto level 4 without the provision of services which require a multi-agency and coordinated approach. The DSL is to be informed of such cases.

### **12. Level 2 Concerns: Early Help for Children with Emerging Problems**

At this level, additional support can be given to children who have vulnerabilities by professionals who are already involved with the child / young person and / or family, for example health, education staff. A coordinated approach, such as Early Help, can also resolve problems by children accessing services that meet a child's needs. The on-line referral form

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for Early Help can be found [here](#)

### **13. Level 1 Concerns: Universal Services**

At this level, children have no additional needs and worries or concerns are short-lived and can be resolved with support by extended family or the school. A welfare plan may well be put into place.

### **14. Concerns about a Child**

#### **14.1 Record Keeping**

The DSL is responsible for keeping accurate, detailed and secure records of children's concerns, actions and outcomes. These are logged via CPOMS and only accessed by named members of the safeguarding and senior leadership team.

All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing (signed and dated) and used to capture the child's voice and their daily lived experience.

We will continue to support any child leaving the School about whom there have been concerns by ensuring that all appropriate information, including Safeguarding and welfare concerns, is forwarded under confidential cover to the child's new school as a matter of priority. Schools should have at least two, if not three, contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home in order to reduce the risk of not making contact with family members where welfare and/or safeguarding concerns are identified.

#### **14.2 Talking to Children**

All members of staff and adults in contact with children are responsible for being vigilant in looking out for the safety and wellbeing of children and should be able to voice their concerns about any child's welfare. Staff may have genuine concerns that are backed by evidence or there may be occasions when staff may only suspect that a child may be at risk. The child's behaviour may have changed, their actions may reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the child the opportunity to talk.

There may be occasions when a child may disclose something unexpected to them either on their own or preferably with a member of the safeguarding team present. **The staff member will need to let the child know that they must pass the information on – staff are not allowed to keep secrets or promise to keep the matter confidential.** The point at which they tell the child this is a matter for professional judgement.

All staff and adults working at KPS have been given the following guidelines to follow, also detailed in the safeguarding blog:

**Listen carefully** to what the child is saying – do not appear shocked at any information that is disclosed.

**Give them the tools to talk** – use simple prompts to help them share what's happening and how they're feeling, e.g. is there anything else you wish to say? Can you explain what you mean? Do not bring your own interpretation into the situation or ask leading or investigative questions.

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**Let them know they've done the right thing by telling you** – give them reassurance.

If they are being abused tell them it's not their fault and be reassuring through nods or words such as "I'm so sorry this happened"

**Do not be afraid of silences.**

**Say you'll take them seriously.** Make sure they can trust you and you'll listen and support them. Do not automatically offer physical touch as comfort.

**Explain what you'll do next** – speak to someone who will help from the safeguarding team.

Never promise to keep it only to yourself but it will be shared with the relevant people.

A record must be made on CPOMS as to what has been alleged, noticed and reported, where it is kept securely and confidentially. Use of full names or linked initials is recommended to avoid ambiguity. A body map is also available on CPOMS as required. Nothing is too small to record and may add up to a larger picture. Staff are also encouraged to have a conversation with the DSL. The DSL is then responsible for making decisions about referrals. The DSL must differentiate between children who are at need of additional support (in need) and those considered at immediate risk (at risk).

For those children in need pastoral support can be offered, early help or the Bi-borough LSCP / LADO can be contacted for advice or to report allegations. Safeguarding leads should include body maps and any accompanying documentation when submitting referral forms.

All staff have a right to contact the LSCP directly if they feel that a situation is not improving or to challenge an inaction. Those children in need of additional support from one or more agencies will need to use the CAF (Common Assessment Framework) and "Team around the child" (TAC) approaches.

Alternatively, there may be circumstances when a child is at risk and action will need to be taken immediately. The DSL will contact children's social area or police if a crime has been committed and this should be reported within 24 hours / one working day. In such cases the DSL informing the parent/carer of a referral might put the child at risk, and parental consent is not required for referrals to statutory agencies.

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This is summarized in the following flow chart:

Receive - Listen actively, open body language, accept, non-judgmental. Use TED (tell, explain, describe)

Reassure - 'You've done the right thing by coming to me', reassure child that you have listened and hear what they are saying; don't promise what can't be delivered

Respond - Tell what you are going to do and do it. Ensure child is ok before leaving

Report - As soon as possible, to the Designated Senior Lead (DSL) in school

Record - Vital – facts, no opinions – When? Where? Who? What?

Review – Take responsibility to follow up any referral with a DSL

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If a child discloses that he or she has been abused in some way, the member of staff or volunteer should follow this guidance:

In addition:

- Inform the DSL without delay and follow the safeguarding process.
- Complete the Safeguarding incident / welfare concern on CPOMS and forward it to the DSL.
- Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the DSL.
- Further information about what to do if you are worried that a child is being abused is available here in advice for practitioners.

See Appendix A for further details with named individuals

### **14.3 Talking to the Family and the Child**

Advise for the DSL and their team:

- In general, you should always discuss any concerns the School may have with the child's parents. They need to know that you are worried about their child. However, you should not discuss your concerns if you believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.
  - If you make a decision not to discuss your concerns with the child's parents or carers, this must be recorded in the child's Safeguarding file with a full explanation for your decision.
  - It is important to record and consider the child's wishes and feelings, as part of planning what action to take in relation to concerns about their welfare. Capturing the lived experience of the child is paramount to ensure that actions remain child-centered
  - When talking to children, you should take account of their age, understanding and preferred language, which may not be English. It is also important to consider how a SEND child may need support in communicating.
  - How you talk to a child will also depend on the substance and seriousness of the concerns. You may need to seek advice from professionals in the Bi-Borough LSCP Team or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardized.
  - If concerns have arisen as a result of information given by a child, it is important to reassure the child but not to promise confidentiality.
  - It is expected that you discuss your concerns with the parents and seek their agreement to making a referral to the Children's Referral Team, unless you consider that this would place the child at increased risk of significant harm.
  - You do not need the parents' consent to make a referral if you consider the child is in need of protection, although parents will ultimately be made aware of which organisation made the referral. If parents refuse to give consent to a referral but you decide to continue, you need to make this clear.
  - Contact details are as followed:
  - Kensington and Chelsea (Sixth Form) - [socialservices@rbkc.gov.uk](mailto:socialservices@rbkc.gov.uk) or tel: 020 7361 3013
  - Westminster (Senior School) - [accesstochildreancesservices@westminster.gov.uk](mailto:accesstochildreancesservices@westminster.gov.uk) or tel: 020
-

7641 4000

- Police - 999
- If you decide to refer the child without the parents' consent, make sure to record this with a full explanation of your decision.
- When you make your referral, you should agree with the Children's Referral Team what the child and parents will be told, by whom and when.

## **15. Safeguarding Concerns or Allegations made about staff, including Supply Teachers, Volunteers and Contractors**

These procedures should be followed in all cases in which there is an allegation or safeguarding concern that a person working with children has:

- behaved 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 or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If the safeguarding concern or allegation involves the conduct of a member of staff (including the safeguarding team and DSL) or volunteer, a visitor or a trainee the Headmaster must be informed. The Headmaster will then inform the LADO.

If the safeguarding concern or allegation is about the Headmaster, the information should normally be passed to the Chair of KPS Advisory Board who will then notify the LADO (without informing the Headmaster). If the chair of KPS Advisory Board is unavailable, the LA or police should be contacted directly.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that **does not** meet the harm threshold, then this should be shared in accordance with the School's ***Low-Level Concerns Policy***.

All allegations will be dealt with quickly and fairly, in a manner that respects all parties.

### **15.1 Procedures for Dealing with Allegations Against Staff**

Ongoing involvement in cases:

- Liaison by the Headmaster (or chair of KPS Advisory Board) with the Allegations Manager (LADO) or other relevant agencies, such as the police, to decide further steps that need to be taken, within 24 hours of the allegation.
  - The School will make every effort for the case to remain confidential while the investigation is under way. The teacher concerned is legally entitled to anonymity until charged with the offence. The Education Act (2002) prevents the publication of any material that could lead to the identification of the person in question, either by the School or associated individuals such as parents.
  - If the member of staff under investigation is resident on the boarding premises, alternative accommodation will be found away from the boarders.
  - Co-operation with the investigating agency's enquiries as appropriate (including
-

- working closely with the employment agency in the case of supply teachers).
- The person against whom an allegation is made should be informed as soon as possible and be warned that anything said will be recorded. They should also be advised to contact their trade union representative and be given access to welfare counselling or medical advice.
- If there any child at school is potentially at risk of harm, the person is to be suspended, pending the findings of the investigation by the Teaching Regulation Agency.

**Relevant documents:**

- DfE "Keeping Children Safe in Education: Statutory guidance for schools and colleges" (2025) - Part 4: Allegations of abuse made against teachers and other staff, including supply teachers and volunteers.

**Outcomes:**

- After an initial enquiry there may be no need to take further action.
  - If the outcome is malicious, false, unsubstantiated or unfounded, a confidential record will be kept but this will not affect the persons present employment or be mentioned in any reference for employment elsewhere.
  - If the allegation is substantiated, there will be referral to the DBS or The Teaching Regulation Agency, and it will be mentioned in any future reference. The person concerned will either decide to resign or be asked to leave.
  - In the case of allegations about a former member of staff or former pupil or student now above the age of 18, this information should be passed to the Headmaster who, after checking records, will inform the police.
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**16. SUMMARY OF PROCEDURES: STAFF AND CHILDREN**

Student makes a disclosure or allegation  
Ensure you have told the student the information will be passed on

Record info on CPOMS

OR: If the allegation involves a member of staff, volunteer or visitor then inform the Headmaster.

Contact the DSL (RM) or Head of School  
Senior School (EE) 6th Form (SB) Boarding (BM, KJ)

OR: If the allegation involves the Headmaster then inform the Chair of KPS Advisory Board without notifying the Headmaster, or directly to the LA or police if this is not possible.

Send all information to either:  
The DSL (the DSO will also do this AS WELL if you have passed it on to them)  
Or the Chair of KPS Advisory Board if the allegation involves the Headmaster/DSL



Consultations will be had between necessary parties  
*No issue will be dealt with by one member of staff*  
DSL will seek advice from the Bi-borough LSCP / LADO on the best course of action



Relevant bodies will be informed Within 24 hours

NB: Anyone may and should feel able to make a referral directly in exceptional circumstances. If the issue involves the potential for serious harm, then Children’s Social Services should be informed from the outset and the Police or NSPCC should be contacted if necessary. Such exceptional circumstances include:

- the situation being an emergency and the DSL, the Headmaster, the Chair of the KPS Board or the safeguarding team, are all unavailable
- they are convinced that a direct report is the only way to ensure the child’s safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

## 17. Whistle blowing

All adults should report concerns about poor or unsafe practice within the School that may put children at risk and should follow the School's **Whistleblowing Policy**.

The School is committed to creating a culture of transparency where staff feel confident in reporting concerns, especially those that involve safeguarding issues. Staff are reminded of the **NSPCC Whistleblowing Helpline (0800 028 0285)** as an external resource if they feel their concerns are not being adequately addressed internally. All staff will be regularly trained and reminded of the whistleblowing procedures, including their obligation to report any concerns regarding the conduct of colleagues, regardless of seniority.

### 17.1 Concerns about poor or unsafe practice and potential failures in the School's safeguarding regime including low level concerns

All staff and volunteers are encouraged to discuss any aspects of the School's safeguarding regime which is not consistent with the standards and values of the School and does not meet the expectations detailed within this policy, the staff handbook and other related School policies. Equally, any member of staff or volunteer is encouraged to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime.

All concerns, including Low Level Concerns, from any member of staff (irrespective of role within the School) or a volunteer will be taken seriously, even if it is simply a "nagging" feeling. All concerns, including Low Level Concerns, will be taken seriously and acted on in an appropriate and timely manner: these should be reported to the Headmaster – this can be done directly or via the DSL. The Headmaster, as the nominated person, will review the concern, review any previous concerns to look for patterns and make a decision as to either a referral to the LADO, a discussion with the LADO or progressing an internal process. Any action taken will be proportionate to the incident and will look to address further risk to children and young people.

- If a staff member feels unable to raise an issue with either the DSL or the Headmaster then they should contact the Member of the KPS Advisory Board with Responsibility for Safeguarding – details provided in Section 1.2 above.
- Should the individual wish to remain anonymous, then any concerns should be addressed to the HR manager who will then pass these anonymously to the DSL or Headmaster, or the Member of the KPS Advisory Board with Responsibility for Safeguarding.

Where a staff member or volunteer feels unable to raise an issue with any of the above, or feels that their genuine concerns are not being addressed, then they can use the following contacts:

- general guidance on whistleblowing can be found via: Advice on a: Advice on Whistleblowing
  - the NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
  - the Local Area Designated Officer for Safeguarding – details provided in Section 1.2 above.
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## 18. Confidentiality and Sharing Information

Guidance on information sharing is given in the government publication 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL/the Headmaster or the Chair of KPS Advisory Board (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need- to-know' basis.

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, KCSIE (2025) emphasises that any member of staff can contact Children's Social Care if they are concerned about a child.

Child protection information will be stored and handled in line with Data Protection principles. Information should be processed for limited purposes and in accordance with the data subject's rights; it should be accurate, adequate, relevant and not excessive; and it should be kept securely and for no longer than is necessary. All child protection records are stored on CPOMS and only available to relevant individuals.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the Headmaster.

The Data Protection Act does not prevent School staff from sharing information with relevant agencies, where that information may help to protect a child.

### 18.1 Early Help

Any child may benefit from early help, but all school and boarding staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
  - is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking or exploitation
  - is at risk of being radicalised or exploited
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing drugs or alcohol themselves
-

- has returned home to their family from care
- is a privately fostered child

## **18.2 Children at Risk of Significant Harm or Immediate Danger**

If at any time a child has suffered, is at risk of significant harm or danger, a referral must be made immediately to children's social services and / or the police

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

### **Child abduction and Community Safety Incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available

at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) / and [www.clevernevergoes.org](http://www.clevernevergoes.org). Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children **and one includes children aged 12-17 years.**

The guides explain each step of the process, support and special measures that are available.

There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an **online child arrangements information tool** with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## **18.3 Support to Children (Including those about whom there are mental health concerns)**

KPS recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way, and that it is likely to adversely impact their mental health and emotional well-being. Many factors can contribute to an increased risk of being abused, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our children receive equal protection, for example, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers at home during leave periods
- living in a domestic abuse or violence situation
- affected by parental substance misuse
- living away from home
- vulnerable to being bullied, or engaging in bullying, potentially in gangs
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- involved directly or indirectly in Child Sexual Exploitation (CSE)
- do not have English as a first language
- vulnerable to extremism or radicalisation (See Appendices 3 & 4)
- at risk of honour-based abuse (HBA), including female genital mutilation (FGM) or forced marriage.

It is important that staff recognise that mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. For such children school may be one of the few stable, secure and predictable components of their lives. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following this policy and speaking to the DSL or a member of the safeguarding team. The School's ***Emotional Well-Being and Mental Health Policy*** document also explains this in greater detail and should be researched as and where necessary.

KPS seeks to remove any barriers that may exist in being able to recognise abuse or neglect in children with Special Educational Needs or a disability. We will seek to provide such children with the necessary support to build their self-esteem and confidence, helping them to secure the very best educational outcomes they are able to achieve. The context in which safeguarding incidents and / or behaviours occur, whether in school or within or outside the home (including online), will be considered by staff, particularly the DSL and DDSL. Any associated threats or risks will be included in assessments and relevant information included in referrals to Children's Social Care. General indicators of abuse and neglect (from Part 1 of the statutory guidance) are also included in this policy and further information about specific forms of abuse are contained within Appendix A of the statutory guidance, KCSIE (2025).

We recognise that all matters relating to child protection are confidential, in the sense that they

must not be generally discussed. The DSL will only disclose any information about a young person to other members of staff on a 'need to know' basis. All staff must be aware that they have a professional responsibility to share information with other agencies, through the defined school channels, in order to safeguard children. All staff must be aware that they cannot guarantee confidentiality to a young person when listening to any disclosure since an issue may need to be referred on.

## 19. Support for Staff

KPS has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance.

KPS's safer recruitment processes follow the Statutory Guidance: "Keeping Children Safe in Education", Part 3: Safer Recruitment.

All staff receive Safeguarding training as part of their induction programme at KPS and are briefed on the code of conduct for adults working with children. Safeguarding Induction follows the guidance given in KCSIE (2025) and covers the following points:

**All** staff should be aware of systems within the School which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- Child Protection and Safeguarding Policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
- Achievement, Behaviour, Rewards and Sanctions Policy (which should
- include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing
- safeguarding response to children who go missing from education, and
- role of the DSL (including the identity of the DSL and any deputy DSLs).

**All** staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, **all** staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

**All** staff will be aware of their local early help process and understand their role in it.

**All** staff will be aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

**All** staff will know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as DSL (or a deputy DSL) and local authority children's social care. Staff should never promise a child that they will not

tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

**All** staff will be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

**All** staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened.

This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication

Copies of policies and a copy of Part 1 KCSIE (2025) (or Annex A, if appropriate) of this document should be provided to **all** staff at induction.

In addition, on Firefly, all staff have access to the following:

- ***Child Protection & Safeguarding Policy***
- ***Keeping Children Safe in Education Part 1 and Annex A***
- ***Achievement, Behaviour, Rewards and Sanctions Policy***
- ***Staff Code of Conduct***
- ***Whistleblowing Policy***
- ***Anti-Bullying Policy***

All staff receive annual training and updates.

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child/young person as part of a disclosure, or from another adult, that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to the DSL about the support they require. The DSL should seek to arrange the necessary support.

KPS will provide all the relevant information in references for a member of staff moving on from KPS to a different employment including if there have been safeguarding concerns (see procedures for dealing with allegations against staff).

## **20. Working with Parents/Carers/Guardians**

KPS will:

- Ensure that parents/carers have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations in the School prospectus.
- Undertake appropriate discussion with parents/carers prior to involvement of Children & Family Services (Children's Social Care) or another agency, unless to do so would place the child at risk of harm or compromise an investigation.

## **21. Other Relevant Policies**

The KPS Advisory Board's statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance

- Anti-Bullying Policy
- Achievement, Behaviour, Rewards and & Sanctions Policy
- Code of Conduct for Staff
- Complaints Procedure
- Data Protection Policy
- Trips & School Educational Visits Policy
- Equal Opportunities Policy
- Online Safety Policy
- First Aid Policy
- Health and Safety Policy
- Illegal Substances, Smoking and Alcohol Policy
- Emotional Well-Being and Mental Health Policy
- Attendance & Lateness Policy
- Safer Recruitment Policy
- PSHE Policy & Relationships and Sex Education Policy
- Risk Assessment Policy
- Special Educational Needs & Disabilities Policy
- Whistleblowing Policy

The above list is not exhaustive but when undertaking development or planning of any kind the School will consider the implications for safeguarding and promoting the welfare of children.

## **22. Staff Code of Conduct**

All staff are expected to adhere to guidance contained in "Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings" (2022). This guidance outlines the professional boundaries and behaviours expected when interacting with children. Breaches of these boundaries, such as inappropriate communication, unprofessional conduct, or any form of over-familiarity, will be treated seriously and may result in disciplinary action. Additionally, any staff member who is found to have breached these practices may be referred to external authorities, such as the Local Authority Designated Officer (LADO), the Disclosure and Barring Service (DBS), or the Teaching Regulation Agency (TRA).

Adherence to this code should ensure that both children and staff, whether paid or unpaid are safe from misconduct or unfounded allegations of misconduct. Therefore, while communicating with the student's staff will:

- avoid all situations where they are on their own with a child unless necessary and, in such

situations, ensure that there is easy sight of the classroom (no closed doors) and that there is another member of staff or support staff in the vicinity.

- have approved the arrangements for one-to-one tuition or coaching. Last minute or informal arrangements should be avoided wherever possible.
- use only School email addresses, in a formal and professional manner. This should be readily available for scrutiny if necessary.
- not use a child's mobile telephone numbers without express permission of the child's parents and in exceptional circumstances. Text messages should also be avoided.
- ensure all out of School contact with children is authorised by their parents or guardians and / or a senior member of staff.
- avoid giving lifts to children, particularly one-to-one, other than in an emergency when a senior member of staff should be informed.
- seek advice from a senior colleague if a child's need to speak to you seems out of the ordinary or makes you feel uncomfortable.

The School will, on occasion, employ ex-children, who have recently completed their studies, to work in temporary or part-time positions during the recruitment season.

The School acknowledges that the established relationships between these particular individuals and current children may have an impact on the nature of their communication and contact that is distinct from other employees. The School will inform such staff of our Child Protection and Safeguarding Policy and appropriate good practice but if a member of staff has any concerns about this situation, then they are encouraged to contact their line manager or the DSL without delay.

If teaching one-to-one lessons

- avoid meetings with children in remote, secluded areas of the School;
- ensure there is visual access and / or an open door in one-to-one situations;
- inform other staff of the meeting beforehand, assessing the need to have them present or close by;
- avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy;
- consider the needs and circumstances of the child/children involved.

### **22.1 Photography / Video Recording / Audio Recording**

- Any recording taken of a child must be for legitimate academic / educational reasons. The validity and necessity of such recording must be transparent and obvious or approved in advance by a line manager.
- Child consent must always be obtained in advance of any recordings. Recordings must never be clandestine.
- Care must be taken if recording images of children in clothing other than normal school dress,

e.g. sports kit or costume drama. It is never acceptable to record images where children may not be fully dressed, e.g. backstage in drama productions or changing rooms or sports venues.

It is good practice to use designated School equipment to make such recordings. If staff or children have to use their own personal IT equipment to record images, then the appropriate DSL or DDSL should be informed. Recordings taken with personal equipment must be transferred to School IT facilities without undue delay and immediately deleted from the personal equipment. It is good practice to ask a member of the IT helpdesk personnel or a colleague to verify this transfer and deletion.

- All recordings of children on School or personal equipment must be deleted or destroyed once their specific educational purpose has been achieved.
- Any temporarily stored recordings must be held on a School issued computer. They must not be held on a personal computer or equivalent IT device. Copies must not be made nor distributed or shared.

## **22.2 Staff should always:**

- Adhere to all School policies, many of which are specifically written with safeguarding in mind.

Those found in the staff handbook are among others:

- staff IT and Communications Systems,
- Acceptable Use Policy
- Social Media Policy
- Communications Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Anti-corruption & Bribery Policy
- Staff Anti- Bullying Policy, capability procedure (standards and expectations)
- Equal Opportunities Policy
- Health and Safety Policy (also on website)
- Online Safety Policy.
- Behave in a mature, respectful, safe, fair and considered manner at all times.
- Provide a good example and 'positive role model' to the children.
- Observe other people's right to confidentiality (Unless you need to report something to DSL e.g. concerns about a child protection issue).
- Treat all children equally; never build 'special relationships' with individual children or confer favour on particular young people in our care.
- Understand that, in dealing with allegations or incidents of bullying, it may be necessary to invoke safeguarding procedures. Detailed guidance on bullying and racist incidents and the

procedures to follow are provided by the School's Anti-bullying Policy, (available on the School's website)

- Only use reasonable force (the minimum force required) in an emergency situation, and as a last resort, when there is a risk of injury between children and / or staff.

Please note:

It is the perception of the person subject to a remark or action rather than any stated intention that defines 'appropriate' or 'inappropriate'.

### **Reasonable force and restraint**

The Children Act of 1989 has been commonly misinterpreted to mean that any physical contact with a child is unlawful. This is not the case. Where necessary reasonable force can be used to control or restrain children, however the School Standards and Framework Act 1998 forbids corporal punishment.

As per the School's ***Achievement, Behaviour, Rewards and Sanctions Policy, and Exclusions, Suspension, Removal and Review Policy*** corporal punishment is forbidden in all circumstances and is contrary to School policy.

Teachers and other persons who are authorised by the Headmaster to have control or charge of children are allowed to use such force as is reasonable in all circumstances to prevent a child from doing, or continuing to do, any of the following.

- Committing a criminal offence (including behaving in a way that would be an offence if the child were not under the age of criminal responsibility)
- Injuring themselves or others
- Causing damage to property (including the child's own property)
- Engaging in any behaviour prejudicial to maintaining good order and discipline at the School or among any of its children, whether that behaviour occurs in a classroom during a teaching session or elsewhere.

This provision under law applies when a teacher, or other authorised person, is on the school premises and when he or she has lawful control or charge of the child concerned elsewhere e.g. on an authorised out-of-school activity.

Everyone also has the right to defend themselves against an attack provided they do not use a disproportionate degree of force to do so.

Similarly in an emergency, any member of staff would be entitled to intervene. Teachers and other authorised staff are also entitled to intervene in other less extreme situations, which fall into the following three broad categories:

- where action is necessary in self-defence or because there is an imminent risk of injury.
- where there is a developing risk of injury or significant damage to property.
- where a child is behaving in a way that is compromising good order and discipline. The use of "reasonable force" will always depend on the circumstances of the case. There is no legal definition of it. However, "reasonable in the circumstances" means using no more force than is needed. Section 93 of the Education and Inspections Act 2006 allows teachers to use reasonable force to:
  - remove disruptive children from the classroom where they have refused to follow an

instruction to do so;

- prevent a child behaving in a way that disrupts a school event or a school trip or visit;
- prevent a child leaving the classroom where allowing the child to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- prevent a child from attacking a member of staff or another child, or to stop a physical altercation.
- restrain a child at risk of harming themselves through physical outbursts.

The Headmaster and staff authorized by him can use such force as is reasonable given the circumstances to conduct a search for "prohibited items" in accordance with Section 550ZB(5) of the Education Act 1996. However, force cannot be used to allow staff to search for other items banned purely under School policies.

The use of force can be regarded as reasonable only if the circumstances of the particular incident warrant it. The degree of force employed must be in proportion to the circumstances of the incident and the seriousness of the behaviour or the consequences it is intended to prevent and should be the minimum required. Force is usually used to either control or restrain.

A report should be written as soon as possible after the incident and submitted to the Headmaster. Staff may wish to consult a senior member of staff or a representative of their professional association when compiling a report.

Reference: DfE's 'Use of Reasonable Force – Advice for Headteachers, Staff and Governing Bodies July 2013'.

**Staff should Report the following circumstances to the School DSL (as soon as possible)**

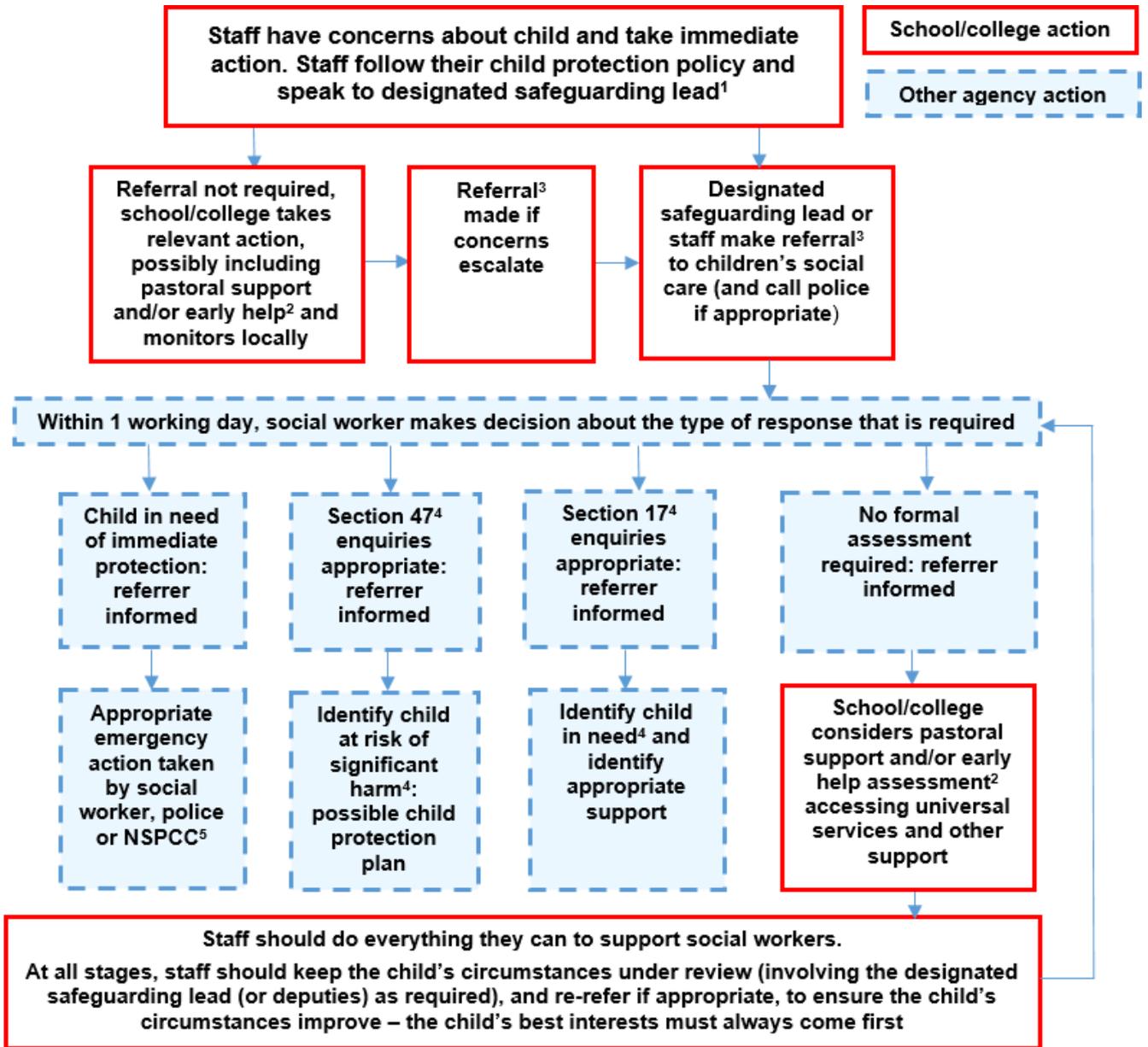
- Any behaviour or situation, which may give rise to complaint, misunderstanding or misinterpretation.
- Any difficulties that you are experiencing, for example, coping with an unruly child; situations where you anticipate that you may not be sufficiently qualified, trained or experienced to deal with or handle appropriately.
- Any behaviours of another person working (report to the Headmaster) in the School, which give you cause for concern or breach of this code of conduct or other School policies and procedures.

**22.3 You should never:**

- Behave in a manner that could lead a reasonable person to question your conduct, intentions or suitability to care for child's welfare.
- Touch children in a manner which is or may be considered sexual, threatening, gratuitous or intimidating.
- Discriminate either favourably or unfavourably towards any child.
- Make arrangements to contact, communicate or meet a child outside of work.
- Have any electronic contact, including through social media with any current or past child unless this has been authorised by the Headmaster/DSL.

- Develop 'personal' or sexual relationships with a child.
- Make inappropriate remarks or jokes of a personal, sexual, racial, discriminatory, intimidating or otherwise offensive nature.
- Intentionally embarrass or humiliate children, for example, by using sarcasm or humour in an inappropriate way.
- Allow, encourage or condone a child to act in an illegal, improper or unsafe manner e.g. smoking or drinking alcohol.

**APPENDIX A: FLOW CHART FOR PROCESSING CHILD CONCERNS**



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

**APPENDIX B: RADICALISATION & EXTREMISM RISK ASSESSMENT, KPS**

	<b>Yes/No</b>	<b>Evidence</b>
Does the school have a policy?	<b>YES</b>	See section 7.8 of this policy
Does the school work with outside agencies on radicalisation and extremism e.g. Channel?	<b>YES</b>	When required with the metropolitan police and Channel team.
Have staff received appropriate training?	<b>YES</b>	Training and awareness sessions for staff on Educare
Has the school got a trained Prevent lead?	<b>YES</b>	The DSL has general training and is in the process of being trained as the Prevent Lead
Do staff know who to discuss concerns with?	<b>YES</b>	Named in Child Protection & Safeguarding Policy
Is suitable filtering of the internet in place?	<b>YES</b>	Smoothwall filtering in place, sites blocked and reports generated and checked.
Do children know who to talk to about their concerns?	<b>YES</b>	Covered in whole school assemblies, as well as PSHE sessions
Are there opportunities for children to learn about radicalisation and extremism?	<b>YES</b>	This is covered in PSHE lessons. Possible liaison with local police in the future.
Have any cases been reported?	<b>YES</b>	
Are individual student's risk assessed?	<b>YES</b>	None identified at this time
What factors make the school community potentially vulnerable to being radicalised?	<b>London location &amp; use of social media</b>	
Risk evaluation	<b>Low</b>	Way Forward: Continue to raise child, , parent and staff awareness and to monitor and report as needed.

Date completed: August 2025 Signed: Ryan Mitchell (DSL) Last updated: August 2025

### **APPENDIX C: CHILD PROTECTION & SAFEGUARDING – INFORMATION FOR PARENTS**

KPS aims to safeguard and promote the welfare of every child in its care and protect them from serious harm. All staff and volunteers are vetted for their suitability to work with children prior to appointment. All staff and volunteers are trained in safeguarding and child protection, and they will report any concerns in accordance with official local safeguarding procedures.

The School has a ***Child Protection and Safeguarding Policy*** which is regularly reviewed and this is available on the School website

It is important for parents to be aware that:

- Staff and volunteers in the School have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of harm. There are four categories of abuse: physical, sexual, emotional, neglect.
- In some cases, the School is obliged to refer cases to the local children's safeguarding board (Bi- borough LSCP) so that a child's needs can be assessed and to consider whether an investigation into possible child abuse is required. In many cases there will already have been discussions between School staff and the parents of the child, and the situation and concerns will not be a surprise to the parents. However, parents may not be told that the School has referred their child to the LSCP if it is thought that this might either put the child at risk or it is in the best interests of the child for the parents not to be told.
- The Bi-borough LSCP endeavours to carry out its enquiries in a sensitive fashion. It has to gather information and generally it can be open with parents about the steps being taken.
- If you think your son/daughter may have been abused you can contact the initial contact and advice team (ICAT) for children resident in:  
Hammersmith & Fulham: 020 8753 6610 (Out of hours – 020 8748 8588)  
Kensington & Chelsea: 020 7361 3013 (Out of hours – 020 7361 3013)  
Westminster: 020 7641 4000 (Out of hours – 020 7641 6000)
- If you think the abuse may have happened at KPS you should contact the DSL for Child Protection, who is the Headmaster (07970 317343). You should contact the Headmaster directly if the abuse involves a member of staff or, if the Headmaster himself is involved, the Chairman of KPS Advisory Board should be contacted.
- If School staff need to express concerns about a child or refer a child to the Bi- borough LSCP, it is understood that this can cause distress or anger for the child's parents. It is important that all parties – parents and School staff – try to discuss these matters as calmly and sensibly as possible.

## **APPENDIX D: CHILD PROTECTION & SAFEGUARDING – INFORMATION FOR CHILDREN**

General:

KPS aims to provide an environment in which there are effective procedures for safeguarding and promoting the welfare of all children in our care. The School starts from the premise that the welfare of the child is paramount. Legally, a child is anyone under the age of 18, but we do have a 'duty of care' for all children in the School. We aim to establish an ethos where children feel secure, know that there are adults to whom they can talk in times of difficulty and where positive steps are taken to build self-esteem and confidence. We also recognise the importance of working with other agencies to ensure the welfare of children under our protection. The School's intention is to:

- Promote the health, safety and welfare of all children in our care.
- Prevent threats to child welfare by creating a safe environment and a strong pastoral system.
- Protect those in our care by following agreed procedures and ensuring staff are appropriately recruited, trained and supported to respond appropriately to child protection concerns.

### **Roles and Responsibilities:**

All adults working with children have a responsibility to safeguard and promote their welfare. There are, however, key people within KPS who have specific responsibilities.

Ryan Mitchell is the Designated Safeguarding Lead (DSL) with the responsibility for overseeing safeguarding and child protection within the School and person to whom all child protection issues should be notified. He is supported by a number of Deputy Designated Safeguarding Lead's who are also trained in safeguarding.

### **What is child abuse?**

**"Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children". (KCSIE 2025)

**Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm.**

It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people (child-on-child abuse), and are usually known to and trusted by the child and family. More rarely this may be by others (e.g. via the internet)

There are four main types of child abuse: **physical abuse, sexual abuse, emotional abuse and neglect.**

The abuser may be a family member, or they may be someone the child encounters in a residential setting or in the community, including during sports and leisure activities. An individual may abuse or neglect a child directly or may be responsible for abuse because they fail to prevent another person harming that child. Children can abuse other children.

Some allegations or incidents of bullying (whether homophobic, racist, religious, sexist, cyberbullying and bullying because you are different) may invoke safeguarding procedures.

More details can be found on the **NSPCC website.**

### **Procedure to be followed by a child if abuse is suspected:**

All members of staff are trained in safeguarding so you can talk to the person you feel most comfortable to share your concerns with. Alternatively, you may contact any of the independent

agencies listed below.

Other external independent agencies:

NSPCC	0800 800500
NSPCC Report Abuse in Education Helpline	0800 136 663
Childline	0800 1111
Samaritans	116123
OFSTED	0300 123 4666
Crimestoppers	0800 555 111

A full copy of the KPS Child Protection and Safeguarding Policy is available on the School website.

## APPENDIX E: BLENDED LEARNING

Some children may need to access their learning on-line. In this case the following safeguarding principles remain the same:

- With regard to safeguarding the best interests of children must continue to come first.
- If anyone within the School has a concern about a child they must act immediately. All staff were reminded before the School's closure that their child protection and safeguarding responsibilities still apply in the case of remote learning. All staff have access remotely to CPOMS and this MUST continue to be used.
- All staff are to be aware of how to spot potential wellbeing and mental health issues, with training on mental health and wellbeing in youth being offered on-line. All concerns must be reported through CPOMS. There are regular catch ups with children in tutor groups, one-to-one and via assemblies for the Senior School, 6th form and for children who would have been in boarding.
- Contact details for the School's DSL and DDSLs are available on the front page of Firefly. Children also have the DSL's mobile phone number printed on the reverse of their key fobs. These members of staff can be accessed via CPOMS, email, Teams and the DSL by phone.
- Through Firefly children are also signposted to age-appropriate practical support from the likes of:
  - Childline – for support
  - NSPCC – helpline for victims of sexual harassment abuse in schools
  - UK Safer Internet Centre – to report and remove harmful online content
  - CEOP – for advice on making a report about online abuse
- Regular safeguarding meetings are being maintained during term time and individual cases are being followed up as appropriate.
- As detailed in the document above all staff and volunteers must continue to be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues or volunteers. If an allegation is made, the member of staff or volunteer receiving the allegation MUST immediately inform the Headmaster/DSL or, in their absence, the DDSL.
- It is essential that unsuitable people are not allowed to gain access to children. Staff are only to contact children using their School email addresses or through Teams. A member of the SMT is included in every Team-teaching group that operates. One-to-one teaching with children is to be avoided where possible. However, where one to one interactions and lessons do occur a member of the SMT and relevant HOF should be included in the team. The timing of conversations with individual children is also logged through Teams.
- Children should be protected while on-line. The School will do all it reasonably can to keep all of the children safe. All staff are required to continue to look out for signs that a child may be at risk. Form tutors are to check in with each child at the start of each day and be the first point of contact. Children are expected to adhere to the School's Online Safety Policy, when working on-line.
- Guidance from the UK Safer Internet Centre on safe remote learning and from the London Grid for Learning on the use of videos and livestreaming are useful references for helping

staff to plan online lessons and/or activities safely when delivering Blended Learning

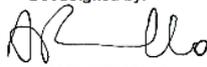
- The School's communication with parents and carers will be used to reinforce the importance of children being safe on-line. The following sites could be helpful: Internet matters - for support for parents and carers to keep their children safe online
- London Grid for Learning - for support for parents and carers to keep their children safe online
- Net-aware - for support for parents and careers from the NSPCC
- Parent info - for support for parents and carers to keep their children safe online □
- Thinkuknow - for advice from the National Crime Agency to stay safe online
- UK Safer Internet Centre - advice for parents and carers
- Welfare and child protection records of children who are either leaving or joining the school will continue to be shared with the receiving institution in whatever way the school reasonably can.
- Appropriate checks are carried out for any new member of staff joining KPS and safeguarding training is given.

KPS Advisory  
Board Member

Signed by:  
  
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24 February 2026

Headmaster

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24 February 2026