



HILLCREST

**HIS Child Protection and
Safeguarding Policy**

Hillcrest International Schools Child Protection and Safeguarding Policy

1. Contact Details

1.1 External

Department of Children Services Kenya	Child Officer Name: Penina Kanyithia Email: westlandsscco@gmail.com
Superintendent of Police	Director of Criminal Investigations for Child Protection Name: Grace Ndirangu Email: Ndirangugrace6@icloud.com Mobile: 0722793696
National Crime Agency Child Exploitation Online Protection (NCA CEOPS)	Lead Investigator Name: Waqar Qureshi Address: British High Commission Upper Hill Road P.O. Box 30465-00100, Nairobi Nairobi Kenya Email: waqar.queshi@nca.x.gsi.gov.uk Mobile: 0719 228 486
United Nations Office on Drugs and Crime	Special Advisor/Law Enforcement Expert Name: Kelvin Lay Address: UNON P. O. Box 67578 Nairobi, Kenya 00200 Email: kelvin.lay@un.org Phone: +254 20 7621234
Karen Police Station	Karen Police Station Address: Ngong Road, Karen Nairobi Mob: + 254 (0)723 829007 cdirnarobi@tsc.go.ke
Teacher Service Commission (TSC)	County Director – Nairobi PO BOX 49416-001000 Nairobi GOP Phone: 0202892000
Kenyan Association of Independent International Schools (KAIIS)	KAIIS PA and Government Consultant Name: Jane Nduta Phone: +245720793972

	Email: jane.nduta@kaiis.org
NSPCC Whistleblowing Advice Line	NSPCC Whistleblowing Advice Line Address: Weston House 42 Curtain Road London EC2A 3NH Phone: +44 800 028 0285 Email: help@nspcc.org.uk
COBIS Board Safeguarding Committee	Vice Chair of the Board Name: Dr Steffen Sommer Address: Council of British International Schools 55-56 Russell Square Bloomsbury London WC1B 4HP Phone: +44 20 3826 7190 Email: pa@cobis.org.uk

1.2 Internal

Governors	<p>Chair of Governors Name: Bob Kikuyu Email: bob.kikuyu@hillcrest.ac.ke</p> <p>Designated Safeguarding Governor Name: Aisha Charters Email: aisha.charters@hillcrest.ac.ke</p>
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Lead (DDSL)	<p>DSL for the School Name: Tiffaney Algar Phone: 0724 255 444 Email: tiffaney.algar@hillcrest.ac.ke</p> <p>Deputy DSL (Secondary) Name: Jane Akelola Phone: 0724 255 444 Email: jane.akerola@hillcrest.ac.ke</p> <p>DSL Prep School Name: Mary Muchangi Phone: 0724 255 444 Email: mary.muchangi@hillcrest.ac.ke</p> <p>Deputy DSL Prep School Name: Julie Kimutai Phone: 0724 255 444 Email: Julie.kimutai@hillcrest.ac.ke</p>

	<p>EYFS DSL Name: Miranda McGovern Phone: 0724 255 444 Email: miranda.mcgovern@hillcrest.ac.ke</p> <p>EYFS Deputy DSL Name: Tabitha Wangeci Phone: 0724 255 444 Email: tabitha.wangeci@hillcrest.ac.ke</p>
Headteachers	<p>Headteacher Secondary School Name: John Eveson Phone: 0724 255 444 Email: john.eveson@hillcrest.ac.ke</p> <p>Headteacher Prep School Name: Scott Webber Phone: 0724 255 444 Email: scott.webber@hillcrest.ac.ke</p>

2. Policy Statement

- 2.1 This policy applies to Hillcrest International Schools which includes the EYFS setting.
- 2.2 This policy is reviewed and updated annually (as a minimum) and is available on the School website.
- 2.3 This policy has regard to the following guidance and advice:
- 2.3.1 Keeping Children Safe in Education (September 2018) (KCSIE)
 - 2.3.2 What to do if you're worried a child is being abused: advice for practitioners (March 2015)
 - 2.3.3 Working Together to Safeguard Children (July 2018)
 - 2.3.4 Information sharing: advice for practitioners providing safeguarding services (July 2018)
 - 2.3.5 Revised Prevent Duty Guidance for England and Wales (July 2015)
 - 2.3.6 The Prevent Duty: Departmental advice for schools and childminders (June 2015)
 - 2.3.7 The use of social media for on-line radicalisation (July 2015)
- 2.4 This policy also considers the procedures and practice of the Kenyan Government and the Kenyan Constitution

3. Concerns About a Child

- 3.1 The School has a duty to consider at all times the best interests of the pupil and act to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility.
- 3.2 The School has arrangements for listening to children and providing early help. Details of these arrangements can be found on the Pastoral Guidance Policy.

3.3 Definitions of Safeguarding and Types and Signs of Abuse

3.3.1 Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

3.3.2 Abuse is 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 (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect

3.3.3 Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

4. Procedures for Dealing with Concerns About a Child

- 4.1 If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.
- 4.2 All staff should:
- 4.2.1 listen carefully
 - 4.2.2 avoid asking leading questions
 - 4.2.3 reassure the individual that the allegation/complaint will be taken seriously
 - 4.2.4 not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

- 4.3 All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead ('DSL') or their deputy).
- 4.4 Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence.
- 4.5 Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:
- 4.5.1 Is disabled and has specific additional needs;
 - 4.5.2 Has special educational needs (whether or not they have a statutory education, health and care plan);
 - 4.5.3 Is a young carer;
 - 4.5.4 Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - 4.5.5 Is frequently missing/goes missing from care or from home;
 - 4.5.6 Is misusing drugs or alcohol themselves;
 - 4.5.7 Is at risk of modern slavery, trafficking or exploitation;
 - 4.5.8 Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - 4.5.9 Has returned home to their family from care;
 - 4.5.10 Is showing early signs of abuse and/or neglect;
 - 4.5.11 Is at risk of being radicalised or exploited;
 - 4.5.12 Is a privately fostered child.
- 4.6 Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- 4.7 In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with British and Kenyan law. The DSL will support staff in liaising with external agencies (if appropriate) and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

4.8 *What staff should do if they have concerns about a child*

4.8.1 If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

4.9 What staff should do if a child is in danger or at risk of harm

4.9.1 If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

4.9.2 The School's safeguarding arrangements take into account the procedures and practices outline in the Kenya Constitution and the Child Protection Procedures outlined by the Kenyan Government.

4.10 What staff should do if a child is seen as at risk of radicalisation

4.10.1 Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to the UK Government's Channel programme or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call the local police.

4.10.2 The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments following consultation with local partners, such as the Police of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

4.11 What staff should do if they discover an act of Female Genital Mutilation ('FGM')

- 4.11.1 Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. They should still consider and discuss any such case with DSL and involve children's social care as appropriate.
- 4.11.2 Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

4.12 What staff should do if a child goes missing from education

- 4.12.1 Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education can be found in the Missing Child Policy.
- 4.12.2 The School will report to the police or the Vulnerable Childrens Office for Karen a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

4.13 What staff should do if they have concerns about another staff member

- 4.13.1 If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors.
- 4.13.2 In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer(s) at the Police and the National Crime Agency Unit.

4.14 What staff should do if they have concerns about safeguarding practices in the school

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Whistleblowing Policy on the school website. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

- 4.14.2 If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the National Crime

Agency Contact details for the National Crime Agency can be found on the Key Contacts page at the start of this policy.

5. Arrangements for Dealing with Peer-on-Peer Allegations

- 5.1 Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include sexting, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment as well as non-sexual violence or verbal abuse. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh", "boys being boys" or "girls being girls". All of these violate the School's traditional belief that all members of the School community should at all times be kind and treat each other with respect.
- 5.2 The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.
- 5.3 The School recognises that children with special educational needs and disabilities can be more prone to peer-on-peer group isolation than other children and will consider extra pastoral support for those children. The Deputy Head Student Welfare (Secondary) and the Deputy Head (Prep) keeps an overview of those students with disabilities and SEN to ensure provision is full and rounded.
- 5.4 The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. All boarding staff at Hillcrest International Schools complete up to date training on peer-on-peer abuse to ensure they are vigilant in this regard and regular boarding meetings include peer-on-peer abuse discussion.
- 5.5 The School takes steps to minimise the risk of peer-on-peer abuse. INSET training and online modules on 'Raising awareness of Peer on Peer Abuse' are completed by all staff in direct contact with children. Whole staff training on diversity, gender, bullying, SEND provision happen throughout the year.
- 5.6 Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below:
 - 5.6.1 A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the

investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the the Police as appropriate.

- 5.6.2 Allegations of rape, assault by penetration and sexual assaults must be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.
- 5.7 The School's approach to sexting is that all incidents involving youth produced sexual imagery should be responded to seriously.
- 5.8 When an incident involving 'youth produced sexual imagery' comes to the school's attention:
 - 5.8.1 The incident should be referred to the DSL as soon as possible
 - 5.8.2 The DSL should hold an initial review meeting with appropriate school staff
 - 5.8.3 There should be subsequent interviews with the children involved (if appropriate)
- 5.9 In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported and guided by the Pastoral Team and support from external agencies will be sought, as appropriate.
- 5.10 When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
 - 5.10.1 the victim;
 - 5.10.1 the alleged perpetrator; and
 - 5.10.2 the other children (and, if appropriate, staff) at the School.
- 5.11 Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

6. Children Who Maybe Particularly Vulnerable

- 6.1 Some children may be at an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.
- 6.2 To ensure that our children receive equal protection, we will give special consideration to those who are:
- 6.2.1 disabled or have special educational needs;
 - 6.2.2 young carers at home during the evenings and holidays;
 - 6.2.3 living in a domestic abuse situation;
 - 6.2.4 affected by parental substance misuse;
 - 6.2.5 living away from home;
 - 6.2.6 vulnerable to being bullied, or engaging in bullying;
 - 6.2.7 living in temporary accommodation;
 - 6.2.8 live transient lifestyles;
 - 6.2.9 living in chaotic and unsupportive home situations;
 - 6.2.10 vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
 - 6.2.11 involved directly or indirectly in sexual exploitation; or who
 - 6.2.12 do not have English as a first language.

6.3 This list provides examples of particularly vulnerable groups but is not exhaustive.

7. Arrangements for dealing with allegations of abuse against teachers and other staff (including the Head, Governors and Volunteers)

- 7.1 The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and the Kenya Laws (including volunteers) have (or are alleged to have):
- 7.1.1 Behaved in a way that has harmed a pupil, or may have harmed a pupil;
 - 7.1.2 Possibly committed a criminal offence against or related to a pupil;
- or
- 7.1.3 Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children
- 7.2 Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should also be referred to the Police and the Department for Children's Services and the Department of Education within Kenya.
- 7.3 If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Department of Education, the Department of Children's Services or, in the most serious cases, the Police, so as not to jeopardise statutory investigations.

- 7.4 All allegations should be investigated as a priority to avoid any delay.
- 7.5 All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head OR to the DSL.
- 7.6 If an allegation is reported to the DSL, the DSL will keep the Head informed.
- 7.7 Where the Head or DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head OR DSL is the subject of the allegation or concern, the Head OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and designated officer. Where the Chair of Governors is the subject of an allegation or concern, reports should be made to the Nominated Safeguarding Governor.
- 7.8 The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.)
- 7.9 All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
- 7.10 The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- 7.11 The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCSIE* when making a decision about suspension and make his/her recommendations to the Head. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
- 7.12 Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
- 7.13 The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's services or the Police.

- 7.14 The case manager will discuss with the designated officer whether a referral to The Association of Independent International Schools (KAIIS) or the Teacher Service Commission (TSC) should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to KAIIS (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the TSC and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- 7.15 On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.
- 7.16 The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.
- 7.17 Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.
- 7.18 Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.
- 7.19 In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to KAIIS.

8. STAFF BEHAVIOUR POLICY/CODE OF CONDUCT

- 8.1 The School's Code of Conduct can be found on the School's website. The aim of the Code of Conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

9. SAFER RECRUITMENT

- 9.1 The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate if applicable. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service. Local documentation will also be required including a police certificate of good conduct.
- 9.2 Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment, Selection and Disclosures Policy and Procedure.
- 9.3 The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriate supervised is set out in the School's HR Policy.

10. MANAGEMENT OF SAFEGUARDING

- 10.1 The School's DSL is Tiffaney Algar who is a member of the leadership team.
- 10.2 Jane Akelola is the DDSL and the person to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.
- 10.3 The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.
- 10.4 The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.
- 10.5 The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the

personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

- 10.6 The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the school always has a 24-hour duty phone managed by a member of the SLT who can contact the DSL or DDSL.
- 10.7 Full details of the DSL's role can be found at Annex B of *KCSIE*.
- 10.8 Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.
- 10.9 The DSL is a member of the schools Safeguarding Committee. This committee meets half termly. The Schools Safeguarding Committee is responsible for ensuring that the Child Protection and Safeguarding procedures and cases within the school are regularly reviewed and those responsible for Child Protection and Safeguarding are held accountable.

11. TRAINING

- 11.1 Induction and training are in line with advice from all Kenyan and British legislation.

11.2 All Staff

11.2.1 All new staff will be provided with induction training that includes:

- the child protection policy;
- the role and identity of the DSL and DDSL's.
- the behaviour policy
- the staff 'code of conduct' including the School's whistleblowing procedure and the IT acceptable use policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE* (*and Part five of KCSIE*).

11.2.2 Copies of the above documents are provided to all staff during induction.

11.2.3 Temporary staff and volunteers in regulated activity will have child protection training;

11.2.4 Visitors and visiting staff will be supervised by a member of the School staff at all times;

- 11.2.5 All staff supplied by other bodies will be made aware of the School's procedures, policy and the contact details of the DSL and his deputies.
- 11.2.6 Volunteers, including governors, will undergo checks commensurate with their work in the School and contact with the pupils.
- 11.2.7 All staff are also required to:
- 11.2.7.1 Read Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via in-school training. Staff will sign to say they have read and understood the updates and confirm by email.
 - 11.2.7.2 Staff who have contact with children must also read Annex A.
 - 11.2.7.3 Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by in-school training with staff.
 - 11.2.7.4 Receive training in safeguarding and child protection regularly. Training will include online safety and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
 - 11.2.7.5 Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via emails bulletins and staff meetings.

12. DSL

- 12.1 The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the LSCB's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

12.2 In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

12.3 The DDSL is trained to the same level as the DSL.

13. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

13.1 Aisha Charters is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. She is a member of the governing body.

13.2 A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. There is a Governors Review meeting at least once in every Governors Meeting cycle for the academic year where Safeguarding procedures and policies are reviewed and a report submitted by the DSL team. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

13.3 If there has been a substantiated allegation against a member of staff, the School will work with a number of different bodies to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

14. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

14.1 Teaching children how to keep safe

4.1.1 The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

14.1.2 Internet safety is an integral part of the School's ICT curriculum and also embedded in PSHE and sex and relationships education.

14.1.3 The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School uses Sophos Firewall Systems to monitor on-line behaviors and activity. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help

manage online behavior that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's IT Acceptable Use Policy which also includes detail on the use of mobile technology in school and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

14.2 Looked after children

14.2.1 The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Elena Troy is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

14.3 Arrangements for Visiting Speakers

14.3.1 Arrangements for Visiting Speakers can be found in our Visitors Policy and Guidance.

15. EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

15.1 Use of mobile phones and cameras

15.1.1 The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Taking, Storing and Using Images of Children Policy.

15.2 DSL for the EYFS

15.2.1 The practitioner designated to take lead responsibility for safeguarding children in the early year's settings is Tabitha Wangeci.

15.3 Duty to notify authorities

The School will inform The Department of Children's Services and the Department of Education of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to The Police, The Department of Children's Services and the Department of Education and the Teacher Service Commission (TSC) as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

15.3.2 The School will notify The Department of Children's Services and the Department of Education within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises whether the allegations relate to harm or abuse committed on the premises or elsewhere.

SIGNS AND TYPES OF ABUSE

Appendix 1

All school staff should be aware that abuse, neglect 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.

Physical abuse: a form of abuse which 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.

Emotional abuse: 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 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats.

Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Neglect: 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 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.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child Sexual Exploitation: is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts 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; and
- Children who regularly miss school or education or do not take part in education¹.

So Called 'Honour Based' Violence: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM) forced marriage, and practices such as breast ironing.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the

warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>.

To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL immediately.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18], teachers should follow the School's local safeguarding procedures.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. 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. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

VULNERABLE GROUPS:

Special Educational Needs and/or Disabilities: Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, Gay, Bi or Trans (LGBT): Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Children who go missing from school: A child going missing from school is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the Missing Child Policy. All unexplained absences will be followed up in accordance with this Missing Child Policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and

b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been

absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

'The designated safeguarding lead should take lead responsibility for safeguarding and child protection.'

This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

Any deputies should be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

The designated safeguarding lead is expected to:

Referrals

- Manage referrals
- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the TSC and KAIIS as required; and
- refer cases where a crime may have been committed to the Police as required.
- liaise with the head teacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Training

In addition to the formal training, knowledge and skills should be refreshed:

- this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments at regular intervals, as required, but at least annually, to

allow them to understand and keep up with any developments relevant to their role so they understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;

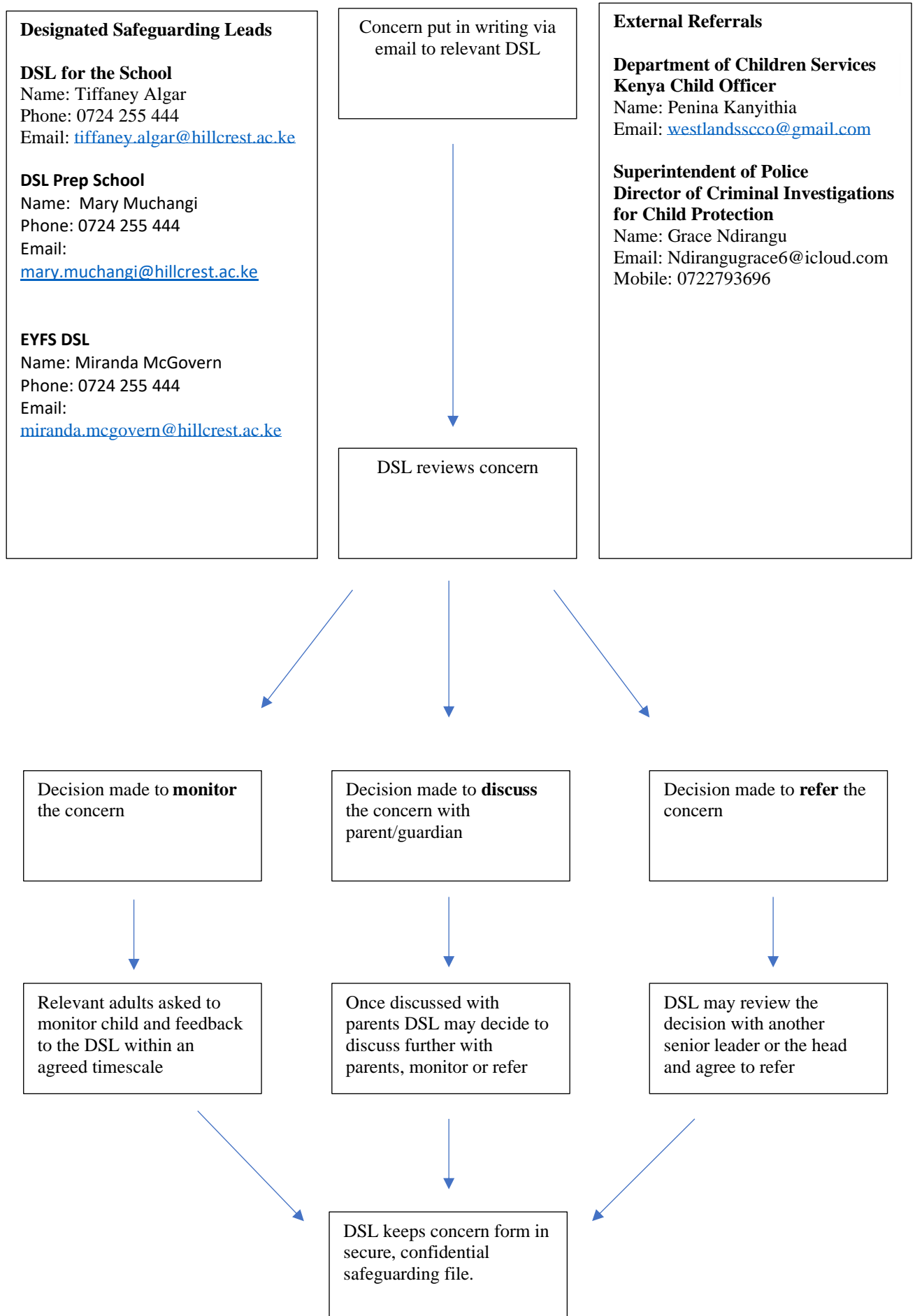
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raising Awareness

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers and the wider School community to share this commitment. The person appointed must be willing to undertake all regulatory checks.

Flow Chart for Raising Safeguarding Concerns About a Child Appendix 3



Neutral Notifications Reporting Form**Appendix 4**

Name of person completing the form:	
Date and Time:	
Please circle:	Self-report Report about another
Countersigned by DSL	
Notification Include relevant background (continue on separate sheet if necessary and number each page)	
Signature:	Date:

