

Kenton College Preparatory School



Safeguarding and Child Protection Policy

Audience	Teachers, Non-teaching Staff, Parents, Governors
Author	Deputy Head Pastoral, DSL, deputyheadpastoral@kenton.ac.ke
Last review	October 2025
Next review	October 2026
Related policies/documents	'Keeping Children Safe in Education (2025) [Part ONE] and Annex B, Staff Code of Conduct, Anti-Bullying, Whistleblowing, Safer Recruitment, Missing Child, Behaviour, E-Safety, ICT and Wellbeing. The Anti-Bullying Policy is published on the school's website.

Table of Contents

PART 1: POLICY OVERVIEW

4	Introduction and purpose
5	Safeguarding principles
5	Policy aims
6	Policy review
6	Key personnel
7	Overall responsibilities
8	The Designated Safeguarding Lead (DSL)
9	The Deputy Designated Safeguarding Lead (dDSL)
9	The Headteacher
10	The Senior Leadership Team
10	Staff and Visitors
10	Good practice guidelines
11	Staff Code of Conduct
12	Governor responsibilities
13	Staff Training
14	Allegations against staff
17	Whistleblowing
18	Low-Level Concerns
22	Abuse of position of trust
22	The use of reasonable force
22	Safer recruitment
23	Site security
23	Opportunities to teach Safeguarding
24	Response to Non-Recent/Historical Abuse Allegations

PART 2: CHILD PROTECTION PROCEDURES

24	Identifying concerns
25	Recognising abuse and neglect
26	Taking action
27	Pupil Disclosure
28	Recording information
28	Notifying parents/guardians
29	Referring to external agencies
29	Child Protection Advocacy Network
29	Identifying children in need of early help
30	Confidentiality and information sharing
30	File management and transfer procedures
31	Safeguarding the drop-off and pick-up of children

PART 3: SAFEGUARDING ISSUES

32	Child abduction
32	Child sexual exploitation
33	Child criminal exploitation
34	Child financial exploitation
34	Preventing radicalisation
35	Female genital mutilation
37	Honour based abuse
37	Mental health
37	Peer-on-peer abuse
38	Sexual violence and sexual harrassment
41	Upskirting
41	Serious violence
42	Contextual safeguarding
42	Domestic abuse
42	Homelessness
43	Children missing in education
43	Absence from school
44	Children who run away or go missing
45	Looked after children
45	Online safety
45	Filtering and Monitoring
46	Procedures when a Member of Staff, DSL or Headteacher Faces Allegations of Abuse

PART 4: APPENDICES

52	A) Low Level Concern reporting form
54	B) Safeguarding Concerns Reporting form

PART 1: POLICY OVERVIEW

Introduction & Purpose

The Board of Governors and staff of Kenton College take seriously their responsibility for safeguarding and promoting the welfare of all pupils in their care. The Kenton College Board of Governors are ultimately responsible for the provision stated in this policy. Kenton College recognises our moral and statutory responsibility to promote the welfare of pupils and safeguard and protect them from harm. We endeavour to provide a safe, caring and listening environment where pupils are respected and valued. Kenton College is alert to the signs of abuse and neglect and we follow the procedures set out in this policy to support pupils, with their best interests at the centre of all that we do.

Kenton College is a listening school. Pupils have a voice and it is heard, considered and acted upon. We believe that early intervention and support is critical in the protection of pupils and promotion of their welfare. To this end, in addition to the pastoral team composed of form / class teachers, Heads of Year, Deputy Head Pastoral, Deputy Head Juniors and the Wellness Team, there is a trained group of staff known as The Listening Team. Senior Leaders and members of the pastoral team have been trained as Mental Health First Aiders. A counsellor is also available for pupils and staff. It is through this multi-layered approach that we endeavour to ensure that all pupils have options of adults they can confide in and be listened to.

This policy applies to all staff, governors and volunteers working at Kenton College. The governing body and staff of the School take seriously their responsibility for safeguarding and promoting the welfare of pupils in their care; to provide a safe environment; and to work with other agencies to ensure adequate arrangements within the school to identify, assess and support those children who are suffering harm. Harm could include emotional abuse, physical (including sexual) abuse or neglect. Kenton College recognises that any form of abuse directed towards a child could be perpetrated by other children, siblings, parents or carers/guardians, extended family members, members of staff (teaching or otherwise) or by people not known to the child. Kenton College also practises “contextual” safeguarding (i.e. the local context of the school, families, Nairobi, Kenya and East Africa are taken into account when investigating child protection and/or safeguarding concerns to ensure that the most beneficial outcomes are reached for the child(ren) in its care).

This policy is intended to guide all staff in the school in providing an environment in which children feel secure, their viewpoints are valued, they are encouraged to talk and they are listened to. We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child’s wellbeing and welfare is our paramount concern. Compliance to the aims and procedures provided in this policy are mandatory. This policy complies with:

- Keeping Children Safe in Education (September 2025)
- Disqualification under the Childcare Act 2006 (September 2018)
- Working Together to Safeguard Children (December 2023 – updated in February 2024)
- Relationship and Sex Education (July 2025) (when contextual applicable)
- Prevent Duty Guidance: for England and Wales (March 2023)

In this policy:

- DSL means the Designated Safeguarding Lead appointed by the School and is part of the school's Senior Leadership Team.
- Director of Children's Services means the Director of Children's Services in Kenya, appointed under section 37 of the Kenya Children's Act, Act No. 8 of 2001.
- ICT means Information and Communication Technology.
- PSHE means Personal, Social, Health and Economic Education, also referred to as Wellbeing
- Child refers to any person under the age of 18 years old.

Safeguarding principles

Safeguarding and promoting the welfare of all pupils, regardless of their age, disability, SEND, gender, ability, culture, race, language or religion is of paramount importance at Kenton College.

Everyone's responsibility: Safeguarding and promoting the welfare of pupils is everyone's responsibility. If pupils and families are to receive the right help, at the right time, everyone who comes into contact with pupils and their families has a role to play in identifying concerns, sharing information and taking prompt action.

Pupils First: In order to fulfil our responsibility effectively, all members of the school community should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the pupil.

It could happen at Kenton: Staff working with pupils are advised to maintain an attitude of 'it could happen at Kenton' where safeguarding is concerned. Safeguarding and promoting the welfare of children is defined within KCSIE (2025) and for the purpose of this policy 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

Note: Children includes everyone under the age of 18.

Policy Aims

Ensuring we practise safe recruitment in checking the suitability of all staff to work with children and ensuring staff are trained, guided and supported to respond appropriately and sensitively to child protection concerns.

Establishing and maintaining a safe environment where pupils can learn and develop. Pupils should feel secure, should be encouraged to talk and should always be listened to.

Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.

To ensure pupils know that there are adults in the school whom they can approach if they are worried.

Provide support to pupils who may have been abused.

For all members of staff to appreciate and realise that pupils who are looked after, adopted, receiving Learning Support, have SEND, or who have specific emotional needs and are, therefore, at risk of child protection/safeguarding issues.

Policy Review

This policy will, as a minimum, be fully reviewed once a year. The policy will be formally ratified by the Board of Governors. The Senior Leadership Team will review the policy on a more regular basis to ensure it remains current, reflects any amendments to statutory guidance and to ensure it reflects local contextual needs and local safeguarding provisions/partnerships. Any amendments beyond the full annual review will be approved by the Safeguarding Governor. The most current review and dates are located on the front page.

Key Personnel

Name	Role	Phone	Email
Sally Weston	Headteacher	0722205038	admin@kenton.ac.ke
Cosima Wetende	Safeguarding Governor	0722205038	admin@kenton.ac.ke
Rachel Hulland	Designated Safeguarding Lead	0722205038	admin@kenton.ac.ke
Kelly Andola	Deputy DSL	0722205038	admin@kenton.ac.ke
Kez Thiong'o	Early Years DSL	0722205038	admin@kenton.ac.ke
Dr Jackline Kaharo	School Doctor	0722205038	admin@kenton.ac.ke

There is a Designated Safeguarding Lead whose specific responsibility is to coordinate action within the school and to liaise with the Director of Children's Services, the Police and other agencies over suspected child abuse. There is a Deputy DSL and EY DSL trained to the same level as the DSL. The DSLs or the Deputy DSL are always available during term time school hours. The DSLs (and the Deputy DSL) are constantly referred to as the "go to person" in this policy based on the likelihood that they will have the most complete picture available for a particular child or group/family of children. Legal

responsibility for the welfare and care of children still lies with all adults employed by or contracted by Kenton College.

The Headteacher and assigned Safeguarding Governor (representing the Board of Governors on Safeguarding matters) have a responsibility to ensure that procedures and guidance set out in this policy are adhered to and that the children enrolled in Kenton College are safe. The Headteacher and the Safeguarding Governor line-manage the work of the DSLs and/or Deputy DSL in all matters relating to Child Protection and Safeguarding. In a case involving allegations made against the DSL, the Headteacher and the Safeguarding Governor will undertake the responsibility to investigate the allegations and reach an outcome with the safety of the child/children at the centre of any decisions made.

Any decisions to seek advice or refer pupils to outside expert help will be undertaken by the DSLs in liaison with the Headteacher and Designated Safeguarding Governor.

All staff must be familiar with the contents of this policy and understand their responsibilities in being alert to the signs of abuse and the responsibility of referring any concerns to the DSL.

Parents should have an understanding of the responsibility placed on the school and staff for child protection. The obligations are set out in the Parents' Handbook.

Records of all concerns will be kept securely by the DSL.

Procedures laid out in this policy will be followed where an allegation is made or suspected.

The school will endeavour to support pupils through:

- the content of the pastoral care systems (see Pastoral Care Policy).
- the wellbeing (PHSE) curriculum.
- a positive, supportive and secure school ethos which gives the pupils a sense of being valued.
- ensuring that, when a pupil leaves Kenton, information about any child protection or safeguarding concerns is transferred to the new school.

Overall responsibilities

Kenton College upholds values of Kindness, Respect, Honesty and Courage in all that we do. These values permeate all aspects of Kenton College. Ethically, we are committed to tackling any child protection issues directly with respect, honesty and courage to all the children and adults involved or alleged to be involved as we firmly believe that children have the right to a safe, happy and purposeful learning experience. Whilst Kenton College is a British School, all members of the school's management (both Senior Leadership Team and Board of Governors) recognise that we are in Kenya and, therefore, respect and act upon Kenyan legislation and laws that "ensure that the welfare of children is paramount" (Constitution of Kenya, 2010). The school's management accepts and endeavours to appreciate our Kenyan context and sensitively navigate cultural practices that may negate the law of the land.

Safeguarding and promoting the welfare of pupils is everyone's responsibility. Everyone at Kenton who encounters pupils, and their families have a role to play in safeguarding pupils, as they are in a position to identify concerns early, provide help for pupils, promote their welfare and prevent concerns from escalating. All leaders, staff, governors, visitors and volunteers at Kenton should always consider what is in the best interests of pupils and provide a safe environment where they can learn. Kenton works closely with parents/guardians to offer support and advice or to direct to other services when required. Although safeguarding and child protection is the responsibility of the whole school community, delegated responsibilities are allocated to specific roles (see below) so that provision can be as effective as possible.

The Designated Safeguarding Lead (DSL)

There is a Designated Safeguarding Lead whose specific responsibilities are outlined below.

- Have lead responsibility for safeguarding and child protection, detailed within their job description.
- Will be aware of other personal, family or contextual factors which may make pupils more vulnerable, e.g. pupils with special educational needs.
- Be available, during term time and within school hours, for staff to discuss any safeguarding concerns. Where this is not possible adequate and appropriate cover arrangements will be arranged.
- Refer cases of suspected abuse or allegations to the relevant investigating agencies as appropriate.
- Coordinate the school's contribution to child protection plans.
- Provide relevant up-to-date training and updates regarding contextual risks to all staff.
- Liaise with the Headteacher on all safeguarding and child protection matters.
- Liaise with staff (especially teachers, pastoral team staff, school Doctor and nurses, ICT Team, school counsellor and special educational needs coordinator (SENCO/Head of Learning Support) on matters of safety and safeguarding and welfare (including online and digital safety).
- Promote supportive engagement with parents/guardians about safeguarding matters and promoting the welfare of children, including where families may be facing challenging circumstances.
- Will ensure child protection files are secure and kept up-to-date.
- Ensures that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main pupil file and ensures secure transit).
- Ensure that this policy and procedures are reviewed and updated annually liaises with the Safeguarding governor and Headteacher as appropriate.
- Makes staff aware of any changes to this policy.
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand and support 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.
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.

- Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.
- Will respond to/be aware of unauthorised absences or children missing education where there are known safeguarding risks and consider the provision of pastoral and/or academic support.
- Provide appropriate safeguarding and child protection training (including online safety) which is updated regularly.
- Ensure all staff are aware and understand their role in safeguarding pupils.
- Ensure all staff know what to do if a pupil confides in them that they are being abused, exploited or neglected and how to reassure the pupil(s) appropriately to keep them safe.

The Deputy Designated Safeguarding Lead (dDSL) and EY DSL

The Deputy DSL and EY DSL will be trained to the same level as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. The ultimate responsibility for child protection remains with the DSL. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

The Headteacher

The headteacher will ensure that:

- The policies and procedures adopted by the Board of Governors are followed by all staff.
- This policy is reviewed and updated whenever it is required, at a minimum this will happen annually.
- The appointed DSL and dDSL are appropriately trained.
- A Single Central Record all staff and their safeguarding training dates is maintained and that this list confirms that all staff have had relevant checks.
- All staff feel able to raise their concerns about poor and unsafe practice in regard to pupils, and such concerns are addressed in a timely manner in accordance with agreed policies.
- The Headteacher undergoes child safeguarding training which is updated regularly.
- Staff will receive and understand the Staff Code of Conduct.
- Newly appointed staff will be informed of Kenton's arrangements for safer working practice as part of their induction process before beginning work and contact with pupils and will complete the relevant safeguarding/child protection training.
- Staff must wear ID at all times when in school and when out on school business.
- Procedures for managing visitors are in place that put the safeguarding of pupils at the centre and are applied to all visitors irrespective of their status and frequency of visits. Staff should not shy away from questioning visitors, regardless of status if they feel that the correct processes have not been followed.

The Senior Leadership Team

The senior leadership team will:

- Provide a coordinated offer of early help when additional needs of children are identified.
- Carry out tasks delegated by the Board of Governors and Headteacher, such as training of staff and safer recruitment.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the school.
- Treat any information shared by staff or pupils with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff, including temporary staff and contractors, are dealt with in accordance with guidance from Department for Education (DfE KCSIE 2025) and this policy.

Staff and Visitors

All staff contribute to providing a safe environment in which pupils can learn and are aware of systems within the school which support safeguarding. This includes being able to identify emerging problems to recognise pupils who may benefit from early help. All staff need to be able to identify concerns early and provide help to pupils to prevent concerns from escalating. All staff should be aware that pupils may not feel ready or know how to tell someone if they are being abused, exploited or neglected. They may not recognise their experiences as harmful, as they may consider it the 'norm'. Additionally pupils may feel embarrassed, humiliated or threatened. This could be due to one of, or a combination of the following: age, vulnerability, disability (including difficulties with speech and language) or language barriers. Staff know in the first instance to raise their concerns with the Designated Safeguarding Lead and understand they may be required to support further.

Good practice guidelines for staff

All staff and Governors complete a safeguarding induction before beginning work at Kenton. An accurate record is kept of all Safeguarding/Child Protection training. All staff receive regular and ongoing safeguarding training, so that they are aware of and alert to the signs of abuse. Visitors are all made aware of the school's procedures and key staff before entering the school building.

Expectations of good practice include:

- Recognising that safeguarding and promoting the welfare of pupils is everyone's responsibility.
- All professionals should make sure their approach is child-centred. This means that they should consider, always, what is in the best interests of the child.
- Maintain an attitude of 'it could happen at Kenton' with regards to safeguarding.
- Reading and understanding this policy and all other related policies.
- Recording and referring all concerns about a pupil's safety and welfare without delay to the DSL, or, if necessary directly to police.
- Treat information sensitively and with confidentiality. Never promise to 'keep a secret'.

- Establish and maintain an environment where pupils feel secure, are encouraged to talk, and are listened to.
- Ensure pupils know that there are adults in the school who they can approach if they are worried or have concerns.
- Encouraging positive, respectful, and safe behaviour among pupils.
- Being alert to changes in pupils' behaviour and attendance patterns and understanding that this may be a sign that they are suffering harm or that they have been traumatised by abuse.
- Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered 'that sometimes children will 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...' This should not prevent staff from having a professional curiosity and report any concerns to the DSL.
- Recognising that challenging behaviour may be an indicator of abuse.
- Being aware that the personal and family circumstances and lifestyles of some pupils can lead to an increased risk of abuse.
- Understanding of, and compliance with, values, procedures and statutory guidance as outlined in KCSIE (2025).
- Plan opportunities within the curriculum for pupils to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Follow whistleblowing and low-level concern procedures as appropriate if the disclosure is about a member of staff, governor or visitor

Staff Code of Conduct

In general, pupils should be encouraged to discuss with their parents or guardians issues that are troubling them. Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse.

Staff should never take one pupil in his/her own car.

Staff need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, it is good practice to ensure that others are within earshot. Where possible, a gap or barrier should be maintained between teacher and child at all times.

Any physical contact should be the minimum required for care, instruction or restraint. Staff only use reasonable force to prevent pupils from hurting themselves or others, or from damaging property. Staff will receive safer handling training annually. Any physical restraint of a pupil is only permissible when a child is in imminent danger of inflicting an injury on him/herself or on another, and then only as a last resort, when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of physical restraint should be recorded in writing and reported immediately to the DSL.

Staff should not give their personal mobile phone numbers to pupils, nor should they communicate with them by text message, personal email or through social networking sites. If they need to speak to a pupil by telephone, they should use one of the school's telephones and be accompanied by another member of staff.

If the school shifts to online teaching for any reason, the Online Teaching and Learning Policy will outline safeguarding guidance.

Staff should refer to the Staff Code of Conduct for more information

Governor Responsibilities

Governors:

- Hold strategic leadership responsibility and comply with the duties under 'Keeping Children Safe in Education' responsibilities.
- Ensure one of their members is nominated to liaise with the DSL and Chair of the Board on issues of child protection in relation to safeguarding and in the event of allegations of abuse made against the Headteacher or member of the Governing Body.
- Ensuring that all staff and governors read and fully understand at least KCSIE (2025), Part One Annex A as a minimum, and ensure that there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as required within the guidance.
- Ensure that all staff are aware of the indicators of abuse and neglect as outlined in KCSIE (2025). This includes abuse, physical abuse, emotional abuse, sexual abuse and neglect.
- Ensuring appropriate responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, including child sexual exploitation.
- Be aware of the issues involving the complexity of serious violence and sexual violence and sexually harmful behaviour and ensure the school has the training and resources to manage any concerns or harmful incidents.
- Be alert to the growing concerns linked to contextual needs and ensure the school works closely with the police and safeguarding partners to raise awareness of the impact of such risks and adopt proactive practice to address concerns locally and within the community.
- Ensure there is no period where there is no appointed safeguarding governor. E.g. after a member resigns and before another is appointed. If necessary, a governing body will provide a transition period where there will be two appointed governors.
- Ensure that the school has a child safeguarding policy, Single Central Record, operates Safer Recruitment procedures, makes appropriate checks on staff and has procedures for dealing with allegations against staff.
- Ensure that the school creates a culture of Safer Recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might pose a risk to children (Safer Recruitment, KCSIE 2025).
- Ensure that staff undergo safeguarding child protection training at induction and that there are arrangements in place for staff to be regularly trained (including online), and updated to ensure that safeguarding remains a priority.
- Ensure staff and Governors are aware of the 4 types of indicators of abuse/neglect.
- Ensure that the school has appointed a member of staff of the school's leadership team to the role of Senior DSL.
- Ensure the school keeps an up to date Single Central Record of pre-employment checks, specifying when the check was made and when it will be renewed.
- Monitor the adequacy of resources committed to child safeguarding, and the staff and governor training profile. Recognise that neither it, nor individual Governors, have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against staff).

- Ensure appropriate statutory policies are in place to allow for appropriate action to be taken in a timely manner, including; Child Protection Policy, Behaviour Policy, Code of Conduct and appropriate safeguarding arrangements.
- Ensure this policy and practice complements other policies e.g. anti-bullying including cyber bullying, health and safety, to ensure an integrated model of safeguarding operates across the school.
- Ensuring appropriate filters and monitoring systems are in place and monitored regularly to review effectiveness to protect pupils online and that pupils are taught about keeping safe online through the curriculum.
- Ensure, where reasonably possible, that school holds more than one emergency contact for each pupil.

Staff Training

All new staff will, during their induction, receive training on their responsibilities in being alert to the signs of abuse and the procedures contained in this policy.

All staff will undergo regular training through EduCare courses and inservice. The DSL, Deputy DSL, Headteacher and Safeguarding Governor will undergo professional training to Level 3 - refreshed as necessary.

New staff will be provided with the following policies in their induction pack:

- Safeguarding and Child Protection Policy
- Whistleblowing Policy
- Staff Code of Conduct (Staff Behaviour Policy)
- Copy of Part 1 of “Keeping Children Safe in Education” including Annex A - DfE September 2025
- Identity of the DSL and other key safeguarding personnel.

All staff are also required to read Part 1 of the Keeping Children Safe in Education (2025), which is shared with all staff by the DSL. All staff will be notified when changes are made to this document and are required to re-read. This section of the KCSIE (2025) will be included in INSET training and reminded of any updates in Staff Meetings to ensure that it is understood by all staff. All staff will sign a form, kept in the SCR, to indicate that they have read and understood this document.

In addition, all staff will be required to complete Prevent Duty and Child Protection training before start date (or within 2 calendar years before their start date if this has been completed in a previous school and valid certificates can be provided). This is in accordance with the Counter-Terrorism and Security Act (UK Government, 2015).

Updates and training are regular throughout the year at Kenton. These may take the form of email, e-bulletins and staff meetings. These are as required, but at least annually.

Pupils are taught about Safeguarding, including online, through the curriculum and Wellbeing programme. A Safeguarding Newsletter is sent to all parents on a termly basis.

Allegations against Staff

Our Guiding Principles when managing all allegations about the action(s) of a member of staff employed at Kenton College are:

The duty to children: To keep children safe and act in their best interests at Kenton College or elsewhere. This takes precedence over all other duties and includes providing support for all children affected; ensuring the continuity of education and delivery of services to children; ensuring that the best interests of the pupil concerned are the primary consideration in decision-making; where possible, taking into account the pupil's wishes and feelings when making decisions, while recognising that the ultimate decision lies with adults; working with the parents unless to do so would jeopardise the welfare of a child; and working across agency and institutional boundaries to protect children.

The duty to the alleged perpetrator: Ensuring that their rights are upheld (including their employment and privacy rights) and that the principles of natural justice are followed. These principles require Kenton College to provide alleged perpetrators with notice of the allegation and an opportunity to respond.

The duty to the law and mandatory reporting obligations: Ensuring that Kenyan and international legal obligations are complied with; allegations are reported promptly to relevant external agencies; and that the school's immediate actions protect as far as possible the integrity of any future criminal investigation.

As a school, we ensure that procedures are in place to deal with allegations of abuse against teachers and other staff that indicate that they:

- 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 may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This could be when a person has been involved in behaviour outside of school (this may not directly involve children) which might make them unsuitable to work with children.

When an allegation is made against a member of staff, our procedures set out in the policy for dealing with allegations against staff, must be followed. We will respond to all allegations robustly and appropriately.

If an allegation is made, two main aspects will be considered:

- 1) Looking after the welfare of the child – the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse (described below)
- 2) Investigating and supporting the person subject to the allegation

In the event of any complaint or allegation against a member of staff, the Headteacher, Designated Safeguarding Lead or the Deputy DSLs if the Headteacher is not present, will be notified immediately.

If the allegation relates to the Headteacher, the Head of HR and the Chair of Governors will be informed without delay.

The Safeguarding Governor is Mrs Cosima Wetende whose contact details are available from the school office.

If at any point, there is a risk of immediate serious harm to a child, a referral should be made to the police immediately.

The DSL will conduct basic enquiries in line with school procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Results of the basic enquiries will be passed on to the Headteacher as soon as possible.

If the allegation made against a member of staff meets the criteria for a referral, then the Headteacher will discuss the allegation immediately with the Safeguarding Governor and ensure that cases are managed as per Keeping Children Safe in Education (2025). The DSL and Headteacher, in liaison with the Safeguarding governor will determine, as far as possible, whether:

- no further actions are needed, in which case the justification should be recorded by the Complaint Lead and the Designated Officer(s) and an agreement on what information should be put in writing to the individual concerned and by whom
- a strategy discussion should take place in accordance with the statutory guidance Working Together to Safeguard Children
- there should be immediate involvement of the police.

If after initial consideration the concerns do not meet the criteria for a case to be referred, then the school will manage the 'low level' concern in accordance with the Low-Level Concerns procedure (see below). This may include Disciplinary procedures set out in the disciplinary policy. The Headteacher will be the ultimate decision maker on the most appropriate course of action to be taken. This may be done in collaboration with others, such as the Designated Safeguarding Lead. Considerations of any further training or further action will be carried out. Where school is in any doubt as to whether the information meets the 'harm' threshold they will contact the police.

At the DSL and Headteacher's discretion, the Kenton College Allegations Response Team (KCART) may be convened to discuss an allegation. The KCART is comprised of the following:

- | | |
|--------------------------|----------------|
| a. DSL | Rachel Hulland |
| b. Head | Sally Weston |
| c. Safeguarding Governor | Cosima Wetende |
| d. HR Professional | Susan Mungai |
| e. Legal Advisor | Cosima Wetende |

The roles of each member of the KCART defined:

Member of KCART	Defined Role
DSL	Collate information relating to CP/SG/PD issues Report issues to Head and Safeguarding Governor Responsible for training staff and sensitising parents Proactively implementing guidelines on CP/SG/PD
Headteacher	Oversight of DSL Contact point for KCMDT members for DSL Communicate CP/SG/PD updates to DSL Relay board discussions on CP/SG/PD matters to DSL
Safeguarding Governor	Provide impartial advice on CP/SG/PD matters Oversight of DSL and Head Verify the validity of policy amendments for Board Inspect staff members CP/SG/PD knowledge Represent DSL and Head at Board meetings
HR Professional	Ensure best practice during recruitment processes with regards to CP/SG/PD Attend CP/SG/PD training sessions with DSL Ensure “fit for purpose” translations are produced for non-English adult employees Advise DSL and Head on HR-related matters regarding CP/SG/PD Proactively inform DSL and/or Head about CP/SG/PD concerns Attend disciplinary hearings concerning CP/SG/PD issues
Legal Advisor	Be conversant with international and Kenyan CP laws Provide timely feedback to queries from DSL, Head, Governor Proof-read documents relating to CP/SG/PD before publication by KC Advise on any CP/SG/PD related cases and proposed processes Liaise with Lawyers of accused persons and inform DSL, Head and Governor
Local Community Representative	Liaise closely with KCART on local reactions to communications/issues Engage with members of KC and offer counsel as required Be a conduit for allegations that must be passed on to KCART

Whistleblowing

All staff must remember that the welfare of the child is paramount. Kenton College's whistleblowing policy enables staff to raise concerns or allegations, initially in confidence. All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher. The aim of the Whistleblowing procedures are to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally.

For further information, please see the Whistleblowing Policy.

Low Level Concerns

Kenton strives to maintain a culture whereby concerns about staff working with children not behaving appropriately are identified and talked about openly so that prompt and appropriate management of such concerns happens. Kenton insists that all staff are aware that safeguarding concerns can sometimes not meet the harm threshold, but should nonetheless be raised so that early identification of problems can be achieved to minimise the risk of harm to children.

Kenton understands that some staff may be reluctant to share concerns about a fellow colleagues' behaviour towards children and, as such, aim to make the process of reporting a low-level concern as "neutral" as possible. Kenton accepts that it is important to recognise that, in practice, the words 'concern' and 'allegation' can be and are used interchangeably by different people. Sometimes individuals may shy away from the word 'allegation' and express it as a 'concern' instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold (and hence be referable), or, on the other, it does not meet the harm threshold (in which case it should be treated as a low-level concern). The focus, therefore, should not be on the language used by the person disclosing it; the focus should, instead, be on the *behaviour being described*.

Kenton sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, coach, volunteer, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Safeguarding & Child Protection are lived, monitored, and reinforced. The policy should be read in conjunction with the current statutory guidance – Keeping Children Safe in Education (2025).

Staff do not need to be able to determine in each case whether the behaviour in question constitutes a low-level concern, or if it may meet the harm threshold. Once staff share what they believe to be a low-level concern, the Headteacher (in consultation with the DSL/appropriate senior leader/Governor) responds appropriately and in accordance with the school's policies.

Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school's Staff Behaviour and Code of Conduct
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the DSL

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone and not deleting immediately after uploading
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language
- victimisation of particular pupils

The behaviour may not relate directly to a particular child or children but may nonetheless raise an issue or issues of concern with respect to safeguarding a child/ children, and may potentially call into question the adult's suitability to work with children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the school's Code of Conduct), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of school from potential false allegations or misunderstandings.

What if a concern or allegation meets the harm threshold?

Should any of the following be witnessed, these behaviours meet the harm threshold and should be reported immediately using the procedures set out in the Safeguarding and Child Protection policy:

- 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 they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children
- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon
- have, as a parent or carer, become subject to child protection procedures

- are closely associated with someone in their personal lives (eg partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering
- Displaying grooming behaviours (direct use of authority to offend, using material or practical benefits for victims, providing support for isolated children, favouring particular children, and use of alcohol, videos or sexual imagery amongst others. The method of commencing the abuse included the erosion of boundaries, slow progression to abuse, use of trust and authority, meeting the child's needs (including physical and emotional), and developing relationships with the child's family).

In summary:

Concern or allegation that may meet harm threshold

Behaviour which indicates that an adult who works with children has:

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

Low-level concern

Does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working with children may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

Appropriate conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Headteacher. However, it is never too late to share a low-level concern if this has not already happened.

Where the Headteacher is not available, the information will be reported to the designated safeguarding lead (or Deputy Head Academic - the first deputy), i.e. the most senior member of SLT acting in this role. The DSL or Deputy Head Academic will inform the Headteacher of the concern in a timely manner.

Low-level concerns about the DSL will be reported to the Headteacher and those about the Headteacher will be reported to the Chair of Governors. Where the low-level concern has been reported to the DSL, they will inform the headteacher of the details as soon as possible.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to the headteacher a record of the conversation will be made by the headteacher which will be signed, timed, and dated.

A standardised form for recording low-level concerns (see Appendix A) can be found on the Pastoral Information Google Classroom (code provided to all staff at the start of the academic year or upon joining). Please note that the form must be printed and completed by hand. Copies of the form can also be found in both staffrooms.

Responding to low-level concerns

The Headteacher is the ultimate decision maker in respect of all low-level concerns.

When a low-level concern has been raised this will be taken seriously and dealt with promptly. The headteacher (or delegated member of SLT) will:

- Speak to the person reporting the concern to gather all the relevant information.
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the DSL or HR manager.
- Inform the employer of the member of staff about the low-level concern if the adult is not an employee of Kenton (e.g. a contractor) so that any patterns of behaviour can be recognised by the employer.
- Determine the outcome of a concern or allegation that may meet the harm threshold: substantiated, malicious, false, unsubstantiated and unfounded. For the avoidance of any potential doubt, terminology such as “substantiated, malicious, false, unsubstantiated and unfounded” are not relevant and should not be applied when determining the outcome of behaviour which is initially shared in the belief that it is a low-level concern, and where it is subsequently determined to be a low-level concern

If necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school’s Staff Code of Conduct: no further action will be required.
- Constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the capability and/or disciplinary procedures.
- is serious enough to consult with or refer to the DSL to hand over the case as a Safeguarding / Child Protection issue.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed. When considered with any other low-level concerns that have previously been made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with external agencies
- the decision and the rationale for it
- any action taken.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record, at which stage the person reporting the concern remains anonymous and this anonymity will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (i.e. self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct

Feedback will be given to both parties (individually) to explain why the behaviour was consistent with the Staff Code of Conduct.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the DSL if required. A record of these reviews will be retained by the Headteacher.

References for future employment

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the DSL and found to be substantiated.

What is the role of the Governors?

The Headteacher will regularly inform the Governors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

Abuse of position of trust

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

Staff 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 pupil under 18 may be a criminal offence.

Allegations of inappropriate behaviour and/or abuse of position of trust should be reported using the procedures listed in the section above entitled 'Allegations against staff.'

The Use of Reasonable Force (further information: Positive Handling and Physical Intervention Policy)

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children and young people.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions, the staff member should, in considering the risks, carefully recognise the additional vulnerability of these groups. Reasonable adjustments, in line with duties under the Equality Act 2010, for these groups will also be considered. Where possible these will be identified on individual risk assessments.

Safer Recruitment

Kenton complies with the requirements of Keeping Children Safe in Education (2025) and the Safeguarding Partnerships by carrying out the required checks and verifying the applicant's identity, qualifications and work history.

The Safer Recruitment policy and procedures set out the process in full. At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff are made aware of the disqualification and disqualification by association legislation and their obligations to disclose relevant information to the school. The school obtains written confirmation from external agencies or third party organisations that their staff or other individuals

who may work in the school have been appropriately checked. The school maintains a single central record of recruitment checks undertaken.

Site Security

Visitors to the school are required to have an appointment. The security guards verify the identity of all visitors and then liaise with the Front Office to confirm the visitors attendance. Once confirmed, the visitor is escorted by a security guard to the Front Office to sign in and agree to abide by our safeguarding rules. They are given a badge which confirms they have permission to be on site under supervision. From the moment a visitor is permitted entry to the school, they are not left alone.

Parents who are visiting the school for one-off school events (e.g. sports fixtures, assemblies etc.) do not need to sign in. The Headteacher and/or DSL will exercise professional judgement in determining supervisory levels and whether any additional provisions need to be put into place.

Opportunities to Teach Safeguarding

As a school we need to teach children in an age-appropriate way about online risks associated with social networking, to prevent harm by providing them with the skills, attributes and knowledge to help them navigate risks. Kenton assesses the risks and issues in the wider community when considering the wellbeing and safety of its pupils. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with special educational needs of disabilities.

This approach to tackling sensitive issues promotes a whole school approach to safeguarding giving children the space to explore key issues and the confidence to seek the support of adults should they encounter problems.

Our school actively seeks to raise awareness of and prevent all forms of child-on-child abuse, e-safety incidents and reduce the risk of pupils suffering any sort of harm/abuse now and in the future by:

- creating conditions in which our pupils can aspire to and realise safe and healthy relationships
- a planned programme of Wellbeing (PSHE)
- creating a culture in which our pupils and parents/guardians feel able to share their concerns openly, in a nonjudgmental environment, and have them listened to
- educating children about the nature and prevalence of child-on-child abuse via Wellbeing/PSHE and the wider curriculum and ensuring pupils know what to do if they witness or experience such abuse
- ensuring that no form of peer-on-peer abuse is ever dismissed as just teasing
- ensuring pupils understand how to stay safe online and what to do if they have any worries or concerns
- ensuring parents/guardians are provided with regular, accurate and clear information about how to help protect their children from harm (including e-safety and peer-on-peer abuse) and what pupils are being taught.
- Hosting 'Parents in Partnership' workshops sessions.
- International consultants delivering workshops to pupils, staff and parents.

Response to Non-Recent/Historical Abuse Allegations

Whilst Kenton College is, today, totally committed to the wellbeing and welfare of the pupils in its care, the management and governing body are aware that, given the long history of the school (including the period of time before the current ownership purchased the school in the early 1980s), there is a possibility that the school is approached by individuals or agencies because of non-recent/historical abuse cases. The management of the school will always respond to any such allegations or requests of information in relation to non-recent/historical abuse cases in line with the following guidelines:

- 1) Sympathy and condolences to the individual(s) making the allegations
- 2) An acknowledgement of the bravery it has taken to make the allegations
- 3) A commitment to child protection and safeguarding at Kenton College currently
- 4) Access to records or information that the school may possess from the time that the allegations are said to have been perpetrated
- 5) Contact details: specific, confidential email reporting@kenton.ac.ke
- 6) An offer of being available for any further assistance as a case proceeds

PART 2: CHILD PROTECTION PROCEDURES

Identifying Concerns

All members of staff at Kenton College maintain an attitude of 'it could happen at Kenton' where safeguarding is concerned and will always act in the best interests of the child.

All members of staff and governors will know how to identify pupils who may be being harmed and then how to respond to a pupil who discloses abuse, or where others raise concerns about them. Our staff will be familiar with procedures to be followed.

Recognising abuse and neglect

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Staff understand that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition, and that in most cases multiple issues will overlap with each other.

Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Knowing what to look for is vital to the early identification of abuse and neglect, and specific safeguarding issues such as child criminal exploitation and child sexual exploitation.

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Keeping Children Safe in Education (2025) refers to four categories of abuse. These are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments, including online. Extra-familial harm take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse and serious violence. Annex A of Keeping Children Safe in Education (2025) contains important additional information about specific forms of abuse and safeguarding issues. This includes:

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child financial exploitation
- Child criminal exploitation
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Female Genital Mutilation (FGM)
- Preventing radicalisation
- Peer-on-Peer abuse
- Sexual violence and sexual harassment between children in schools
- Upskirting
- Online abuse
- Modern slavery
- Mental health

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, possibly taking the form of abusive, harassing, or misogynistic messages, the non-consensual sharing of indecent images, especially within chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

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

All staff must act on any concerns immediately and report any concerns they have about a child's welfare to the Designated Safeguarding Lead (or deputy).

Taking Action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen at Kenton”.

If staff have any concerns about a child’s welfare, they should act on them immediately.

- Any member of staff or visitor to the school who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred must report it immediately to the DSL, or in their absence to the Deputy DSL and/or Headteacher.
- If any member of staff receives a disclosure (or they suspect) that a pupil of staff member may be drawn into terrorism or extremism (please refer to The Prevent Duty policy for details), they must report it immediately to the DSL, or in their absence to the Deputy DSL and/or Headteacher (Prevent Duty Guidance for England and Wales - March 2015).
- In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or the Safeguarding Governor.
- The member of staff, volunteer or visitor to the School who receives a disclosure of abuse will be requested by the DSL to write an account of the concerns and/or incidents immediately using the Reporting Form, if they have no access to CPOMS.
- The DSL will immediately follow up any cases of concern in liaison with the Headteacher and Safeguarding Governor.
- If there is physical evidence of recent and severe abuse, the DSL will take the decision (in consultation with the school doctor and Headteacher) to accompany the child to a local General Practitioner or Gertrude’s Garden Children’s Hospital for immediate attention, and initiate an investigation into how the child has sustained injuries. Parental permission will not necessarily be sought as the school would be responding to an emergency situation.
- If appropriate, the DSL will arrange a meeting with the parents with another member of the SLT, or the member of staff who has reported the allegations. Other close relatives of the child may be called in to assist the child and to approach the family concerned.
- In the case of where the parents or guardians have been implicated the matter shall be reported to the Police and/or the Director of Children’s Services.
- Where appropriate, the DSL will arrange for the pupil and the family concerned to see a recognised, recommended counsellor.
- In the case of diplomatic staff, the matter may be reported to the relevant embassy so that action according to the laws of that country may be taken.
- A member of staff must never guarantee confidentiality to a pupil nor should they agree with a pupil to keep a secret, as where there is a child protection concern this must be reported to the DSL and may require further investigation.
- Staff will be informed of relevant information in respect of individual cases regarding child protection on a ‘need to know basis’ only. Any information shared with a member of staff in this way must be held confidentially to themselves.
- In referrals of abuse, Kenton College will differentiate between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies.
- In the case of pupils identified as being at risk of radicalisation, Kenton College will consider the level of risk to identify the most appropriate referral.
- Although decisions to seek support for a child in need, or about whom concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, consent is not

required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

Any member of staff can make a referral to external agencies, which include the CPAN Chair (via the contact details provided within this policy), British High Commission (Community Liaison Officer +254202844000) or Safeguarding Governor (0722205038). Also, UK's NSPCC 0800 280 285. If a member of staff makes a referral to an external agency, it is important that the DSL is informed.

Key points for staff to remember for taking action are:

- report your concern as soon as possible to the DSL (preferably verbally) or Deputy DSL/Headteacher if the DSL is absent
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.

If a pupil does reveal that they are being harmed, staff should follow the advice below in the “Pupil Disclosure” section. Following an initial conversation with the pupil, if the member of staff has concerns, they should report their concerns to the DSL immediately and complete the CPOMS incident report. Staff will reassure the child that they are being taken seriously, regardless of how long it may have taken them to come forward. Abuse that happens online and or outside school, will be treated with equal seriousness.

Pupil Disclosure

All staff need to be aware that a disclosure from a pupil may occur at any time. The location of a disclosure from a pupil may be in private, in a busy classroom setting or in any other place where pupils and teachers interact.

Where a pupil makes a disclosure to the teacher:

- The adult must offer reassurance that anything they say will be treated with respect but may be passed on to an appropriate authority if it is in the pupil's best interest.
- The promise must never be made that whatever the pupil discloses will remain confidential.
- The pupil should not be hurried but should be allowed to make the disclosure in their own way and their own time, although, the pupil may well indicate by their words or demeanour that they are looking for the adult to gently encourage because of the difficulty of the situation.
- Whilst it may be necessary for some limited questioning by the teacher to take place the questioning should never be leading in nature and should never demand in-depth answers. Unskilled in-depth questioning can not only be damaging and distressing to the pupil, but can result in an unsatisfactory outcome of the case. In-depth questioning is a matter for people who are specifically trained, skilled and resourced to deal with such matters.
- The pupil should NEVER be questioned in front of other pupils or be coerced into giving a 'satisfactory' answer.
- After the interview, the member of staff should write down what the child said in their own words. The Incident should be documented on CPOMS and assigned to the DSL along with a verbal discussion. The following key information should be included:
 - time, day of the week, date, and location of the disclosure/discovery
 - identity of child and alleged perpetrator

- details of the demeanour and behaviour
 - who it was reported to
 - the name of the person making the report
- Following the disclosure, the pupil will need to be cared for in a kind and considerate way. As soon as is proper, however, the DSL should be informed. The matter will then be dealt with by the DSL.

Recording Information

All concerns should be reported using CPOMS and be completed as soon as possible, but no later than the end of the day. The DSL must be assigned to the incident.

All concerns should be followed up with a conversation with a DSL, urgent concerns should be followed up with a conversation immediately (even if the CPOMS has not yet been completed)

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded on CPOMS. Information is kept confidential and stored securely electronically.

Records should include:

- a clear and comprehensive summary of the concern
- the date, time, place and context of disclosure or concern
- facts and not assumption, opinion or interpretation
- the non-verbal behaviour and the key words in the language used by the pupil (try not to translate into 'proper terms').
- if there is an observation of bruising or an injury try to record detail, e.g. "right arm above elbow" and the body map on CPOMS must be used (Do not take photographs)
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy).

Notifying Parents/Guardians

The school will normally seek to discuss any concerns about a pupil with their parents/guardians. This must be handled sensitively and in some instances, the DSL may make contact with the parent in the event of a concern, suspicion or disclosure.

If a referral has been made to the police, however, then the DSL will always attempt to contact the parent, if it is deemed appropriate to do so.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the Safeguarding Governor and/or the police before parents are contacted.

Referring to External Agencies

If required, information will be shared with a Children's Officer from the local Police Service immediately. Where a child is suffering, or is likely to suffer harm, the referral to a Children's Officer will be made immediately. They will liaise with the school and possibly other agencies where required.

Child Protection Advocacy Network

Kenton College is a member of the Child Protection Advocacy Network & Multi-Disciplinary Team networks (CPAN/MDT) in Kenya. These networks are sources of medical and legal support and guidance to achieve the objective set forth in this policy.

Designated Safeguarding Leads from schools in Kenya meet regularly to discuss current best practice and share ideas relating to Child Protection and Safeguarding. Other members of the CPAN/MDT include professionals (legal, medical, social care, human rights, law enforcement etc.) who listen to issues, provide advice and present information at the meetings.

All communication to the CPAN & MDT is through the DSP/DSL. Any concerns about procedures should be reported to the DSL and Headteacher (admin@kenton.ac.ke)

Identifying children in need of early help

Keeping Children Safe in Education (2025) defines early help as 'providing support as soon as a problem emerges, at any point in a child's life'.

Staff should be aware that any child may benefit from early help but Keeping Children Safe in Education (2025) highlights that all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs
- has a mental health need
- is a young carer
- is showing signs of being drawn in to antisocial 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, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- 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 at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with SLT, relevant colleagues and parents/guardians to have an action plan in place to support and/or monitor the child.

Confidentiality & Information Sharing

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Information sharing is vital in identifying and tackling all forms of abuse and neglect. Staff should be proactive in sharing information by raising any concerns to the DSL as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of a child.

The Data Protection Act 2019 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. All relevant staff will have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2019 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. The General Data Protection Regulation (2019) governs the means by which organisations comply with its requirements. The school acts as a data controller under this regulation but may on occasions where concerns are raised, share information with the third parties (data processors), such as social care.

File Management and Transfer Procedures

At Kenton College we electronically manage and record safeguarding and child protection files through the use of CPOMS. Information will be logged separately under Safeguarding/Child Protection incidents.

When a request for a safeguarding file is received for any new pupil, this is passed onto the DSL, who then creates an electronic confidential file to include all previous paper documents and chronologies which have been scanned and saved.

When a child leaves the school, a copy of the electronic safeguarding file is transferred to their new school. Prior to any electronic transfer of information, a verbal handover may take place between the DSL and the receiving school's DSL.

Kenton is committed to acting upon all safeguarding requests from other schools that pupils transfer to in a timely manner.

Safeguarding the Drop-off and Pick-up of children

Drop-off:

- Only vehicles with a valid Kenton car sticker are permitted entry to the school compound
- Staff are placed on duty to monitor the dropping off of children in the Main Car Park and at the front of the Early Years building.
- The duty staff will report any concerns to the DSL or Deputy DSL regarding the adults in the vehicle. These concerns may include:
 - Drug or alcohol paraphernalia in the vehicle
 - Suspected intoxication of the driver
 - Visibly unsafe vehicle
 - Firearms
 - Any inappropriate interaction between the adults and the child(ren) being dropped-off
- The DSL or Deputy DSL will decide on an appropriate course of action to safeguard the child(ren). This may include contacting parents / guardians to share the concerns witnessed and record the steps that will be taken.

Pick-up

- Only vehicles with a valid Kenton car sticker are permitted entry to the school compound
- The duty staff will report any concerns to the DSL or Deputy DSL regarding the adults in the vehicle. These concerns may include:
 - Drug or alcohol paraphernalia in the vehicle
 - Suspected intoxication of the driver
 - Visibly unsafe vehicle
 - Firearms
 - Any inappropriate interaction between the adults and the child(ren) being dropped-off
- If the duty teacher has any concern, they will call the DSL or Deputy DSL (or any member of SLT if both are unavailable). The DSL or Deputy DSL will give instructions on how to remove the child from the vicinity of the car park (i.e. send them to the school office). The DSL or Deputy DSL will then contact:
 - The parent or guardian if it is a driver picking up the child
 - The parent or guardian or emergency contact if the concerns are about a parent
 - The Estates Manager to arrange school transportation and a bus monitor in the event that it is required to take a child home

Uber or Taxi Pick-up

- Uber cars or taxis will not be permitted entry to the school compound unless a parent contacts the school before pick-up time.

- If a parent contacts the school prior to pick-up time with details of an Uber or taxi that has been organised to pick up a child, the school office will contact the duty teacher with the number plate of the vehicle and the driver name.
- The school office will also contact the Main Gate and inform the security guards.
- The Uber or taxi will undergo a thorough search before being permitted to enter the car park area.
- The duty teacher will supervise the child entering the Uber or taxi.
- If there is any doubt or concern about the Uber or taxi (from the duty teacher or the security guards) the duty teacher will contact the parent and share the concerns, insisting that alternative pick-up arrangements are made.

PART 3: SAFEGUARDING ISSUES

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Some children may have an increased risk of abuse. Many factors can contribute to an increased risk. When considering if a child is at risk, SEND needs must be considered but staff must not also assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

Safeguarding issues all staff should be aware of include the following detailed below.

Child Abduction

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.

Parents are required to notify the school Front Office if there is a change of person who drops off or picks up a pupil. The carpark duty teachers will be made aware of this. Only vehicles with a current and valid Kenton College car sticker will be granted entry to the school site at permitted times. Vehicles without a valid sticker will be held at the security area and the Front Office contacted.

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. All visitors to the school are only permitted entry once identity checks have been made, the Front Office has confirmed their appointment and a visitors badge is issued and worn. Only then will a security guard escort the visitor to the office. The visitor is not left unattended.

Child Sexual Exploitation

The sexual exploitation of children and young people (CSE) under 18 is defined as that which: 'involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.'

CSE is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

Child sexual exploitation can also occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability' (Department for Education, 2012)

Child sexual exploitation can happen to any young person from any background. CSE can occur over time or be a one-off occurrence, which may happen without the child's immediate knowledge. Although the research suggests that females are more vulnerable to CSE, boys and young men are also victims of this type of abuse. The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people. In all its forms, CSE is child abuse and should be treated as a child safeguarding issue. Full details can be found in KCSIE (2025) which gives further guidance.

Child criminal exploitation

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- 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 education.

‘County Lines’

County Lines’ is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families).

Child financial exploitation

Child financial exploitation may accompany other forms of exploitation, abuse and violence. For example, financial exploitation can be a feature of modern slavery or sexual exploitation and may be used to control the victim (or their families) and prevent them from leaving the exploitative situation.

Preventing Radicalisation

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counter-terrorism and Security Act 2015 (The ‘Prevent Duty’) now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of, becoming radicalised.

Staff are appropriately trained to look out for signs of 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, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Schools have a duty to prevent children from being drawn into terrorism.

The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. Staff will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force. Governors and leaders will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils’ behaviour. The UK government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. Staff should always take action if they are worried. All staff are responsible as individuals to report any concerns.

Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK and Kenya. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

- Risk factors for FGM include:
- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a ‘special’ procedure to become a woman.

Female Genital Mutilations (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reason.’ (World Health Organisation, 1997).

At Kenton, we believe that all our pupils should be kept safe from harm. Cultures that are high risk for FGM are North African countries, including Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

At Kenton College we have a duty to report concerns we have about girls at risk of FGM to the DSL.

Key Point about FGMs:

- Not a religious practice
- Occurs mostly to girls aged from 5 – 8 years old, but up to around the age of 15

- Criminal offence in UK since 1985 and Kenya since 2011
- Criminal penalties include up to 14 years in prison

Reasons for this cultural practice include:

- Cultural identity – an initiation into womanhood
- Gender Identity – moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – un mutilated women are regarded as unclean

High Risk Times:

- This procedure often takes place in the July-August school holiday, as the recovery period after FGM can be 6 to 9 weeks.
- Schools should be alert to the possibility of FGM as a reason why a girl in a high risk group is absent from school or where the family request an 'authorised absence' for just before or just after the July-August school holiday.
- Although, it is difficult to identify girls before FGM takes place, where girls from these high risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services.

Post-FGM Symptoms include:

- difficulty walking, sitting or standing
- spending longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear

Long term problems include:

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure
- cysts and abscesses
- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

It is a legal responsibility for teachers/employed adults to report any case of FGM they discover to the Police. Unless a teacher has good reason not to, they should still consider and discuss such a case with the DSL who may involve the Multidisciplinary Team (CPAN/MDT) as appropriate.

Further information can be found at:

<http://www.safeguardingschools.co.uk/fgm/>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/>

Honour Based Abuse

So-called 'honour-based' abuse 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.

All forms of so-called HBA are abuse and illegal in the UK and Kenya (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, 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. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a concern about a child's mental health it needs to be raised with the DSL and relevant Head of Year so that next steps of support for that child can be put in place where possible. This may initially involve liaison with the school doctor to arrange a session with the school counsellor (with parental permission sought).

Peer-on-peer abuse

All staff should recognise that children are capable of abusing other children (including online). All staff should be clear about their school or college's policy and procedures with regard to peer-on-peer abuse.

Peer on peer abuse can include (but is not limited to);

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse) physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals.

For the management of concerns at Kenton College, we recognise the danger of any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).

In many cases, types of abuse do not occur in isolation, and one particular case of peer on peer abuse may reveal that participants themselves, including the alleged perpetrators, are themselves receiving abuse from other sources.

Given the multi-textured experience in most cases of peer on peer abuse, any response to a case must see the biggest possible picture and aim to consider types of abuse being experienced and capture the full context of the child's/children's experience. In order to achieve this, we aim to discuss any concern with as many sources of information as possible, including staff (directly involved with witnessing a concern or who have knowledge of the pupils involved), friends of relevant pupils, families and any other agencies (like GPs).

In all cases of alleged peer on peer abuse, the actions of the school will:

- 1) Remove any children from immediate risk of harm.
- 2) Investigate incidents by seeking views and testimonies from as many relevant people as possible.
- 3) Resolve the issue and communicate outcomes to relevant parents.
- 4) Sensitise cohorts to the learning points of resolved cases of peer on peer abuse.
- 5) Provide follow-up support for victims and, where appropriate, perpetrators.
- 6) Seek opportunities to sensitise parents to signs, symptoms and action to be taken if peer on peer abuse is suspected.

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. Incidents of this nature could happen inside, outside of school or online. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported. Children who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment, and more likely it will be perpetrated by boys. Regardless of the sex of the victim, they 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. Abuse that occurs online or outside of the school should not be downplayed, but treated equally seriously. A child

may not disclose directly, so staff must be vigilant, and rather than waiting for a disclosure, recognise that young people may not always make a direct report. Information may come from overheard conversations or observed behaviour changes.

Kenton College has clear systems in place for children to confidentially report abuse, knowing their concerns will be treated seriously. These are:

- If possible, managing reports with two members of staff present (preferably one should be the DSL).
- Where the report includes an online element, the DSL and Headteacher supervise the confiscation and searching of a device's history if the device is in school. If nudes or semi-nudes have been shared online, staff must not view, copy, print, share, store, save or forward illegal images of a child. In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).
- If you have already viewed the imagery by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or police) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.
- Recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, or ethnicity.
- Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.

- Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Kenton is aware that notes of such reports could become part of a criminal investigation.

When there has been a report of sexual violence, the designated safeguarding lead (or deputy) 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 will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school will be actively considering the risks posed to all their pupils and put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) should ensure they are engaging with external specialist services as required.

Reports of sexual violence and harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Via training and sharing of key policies the school aims to ensure a calm, considered approach is taken. This will be done on a case by case basis. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- The nature of the alleged incident(s), including whether a crime may have been committed
- The ages and developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have any SEND?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Importance of understanding intra-familial harm and any necessary support for siblings following incidents

- Whether there are ongoing risks to the victim, other children, or staff
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

Kenton College is committed to working with safeguarding partners in managing such scenarios, in line with statutory guidance 'Working Together to Safeguard Children'. If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or person who made the allegation is in need of help or may have abused someone else and this is a cry for help. The school may consider whether the behaviour policy will be implemented at this stage.

Upskirting

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Serious Violence

Important interventions can take place in a school to prevent negative behaviour, such as young people carrying a knife. Primary schools are also increasingly recognised as places where early warning signs that younger children may be at risk of getting involved in gangs can be spotted.

Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched. Preventing violence in schools and colleges can require a mix of universal, targeted or specialist interventions. Kenton College is able to:

- develop skills and knowledge to resolve conflict as part of the curriculum
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour
- understand risks for specific groups, including those that are gender-based, and target interventions
- safeguard, and specifically organise child protection, when needed
- carefully manage individual transitions between schools
- work with local partners to prevent anti-social behaviour or crime.

Risk factors strongly associated with serious youth violence may include:

- involvement in anti-social behaviour
- substance usage
- aggression
- truancy/running away
- irregular attendance patterns
- low academic ability/SEND

Further advice and information relating to this area is provided in the Home Office's (UK) 'Preventing youth violence and gang involvement' and its 'Criminal exploitation of children and vulnerable adults'.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff should be considering the context within which such incidents and/or behaviours occur.

This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services)
- psychological, emotional or other abuse

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children's health, wellbeing, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include:

- household debt
- rent arrears
- domestic abuse
- anti-social behaviour
- being asked to leave their property.

In most cases the school will consider homelessness in the context of children who live with their families, and intervention will be on that basis. Where staff are concerned that a child might be at risk of being/becoming homeless, they must contact the Designated Safeguarding Lead as a matter of urgency.

Children Missing in Education

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. There are many circumstances where a child may become missing from education, but some are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Come from families of service personnel
- Go missing or run away from home
- Cease to attend school
- At risk of becoming, or are identified as homeless

The DSL, in conjunction with the School Secretary, Heads of Year and Class teachers/Form tutors, will monitor unauthorised absence and take appropriate action, particularly where children go missing on repeated occasions, leaves school without a new school being named and are missing for periods during the school day.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. An emergency contact (of a non-parent) telephone number will be held on file for a child which can be accessed and used by the school in case of an emergency.

Absence from school

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school, either via email or a phone call. We have at least two up to date contact numbers for parents/carers. Parents are reminded to update the school as soon as possible if the numbers change.

Children who run away or go missing

Children running away or going missing is a safeguarding issue. Important definitions:

Missing: Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another’.

Absent: ‘A person is not at a place where they are expected or required to be’.

Kenton College adheres to the “Missing Child Policy” (available upon request to the school). In essence, the policy outlines the following procedures.

Procedures

We will ensure a search is made for the child as soon as we become aware that a child is missing. Parents will be notified at the appropriate stage, and a high level of care will be maintained to other children at the school whilst procedures are followed.

Kenton College is situated on a secure site with perimeter fencing and electronic gates.

Consequently, there are a limited number of situations where a child could go missing but in the event of this happening the following procedures will be followed:

- SLT are made aware.
- Enquiries will be made by SLT of the relevant members of staff, as to when the child was last seen and where.
- If appropriate, enquiries will be made by SLT of the remaining children as to when the child was last seen and where.
- SLT will appoint a person or people to immediately carry out a thorough search of all rooms in all buildings, locker rooms, swimming pool, and all outside areas.
- Doors and gates will be checked by the Estates Manager and Security Guards will be interrogated to see if there has been a breach of security.
- If the child cannot be found within twenty minutes, the parents will be informed and the police shortly afterwards, as necessary.
- The search will continue, widening the area until the police arrive.
- Staff will ensure the safety of the other children with regards to supervision and security whilst a search is taking place.

If a child goes missing from an activity outside of school, where parents are not present, the following procedures will be followed:

- As soon as it is noticed that a child is missing, staff supervising the activity will ask children to stand still and carry out a headcount to ensure that no other child has gone astray.
- At any venue, the staff will contact the venue's security who will handle the search and contact the police if the child is not found.
- The remaining children will be gathered into one large group to ensure their security and wellbeing.
- One designated staff member will search the immediate vicinity whilst the other adults will supervise the remaining children.
- The Deputy Head Pastoral will be informed and keep the Headteacher completely informed at all times.

- If deemed necessary, a member of SLT will make their way to the venue to offer assistance and support.
- Staff on the activity will take the remaining children back to the school.
- The Deputy Head Pastoral will contact the child's parents/guardian and check the child has been reported missing to the police.

When the Child is Found

- Two members of staff at the venue will care for and talk with the child.
- When the situation has been resolved the members of staff should review the reasons for it happening and implement measures to ensure that it does not happen again.
- The incident will be logged by the Deputy Head Pastoral.

Key Times and areas to be mindful of

Early Mornings: Pupils should be either in or on the way to/from locker rooms or on Tarmac, unless being supervised by coaches/teachers at an early morning sports activity.

End of day: Pupils are escorted to the Car Park to wait for parents/designated adults to pick them up, unless the child is attending a supervised after school club (extras) or music lesson.

Duty staff will use a school mobile phone to contact the parents of pupils not collected by 4.15pm. If the parent cannot be contacted, the duty staff at the Car Park will contact a member of SLT. A member of SLT will take over the duty.

Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The school will ensure that staff have the necessary skills and understanding to keep looked after children safe, if this situation arises. Appropriate staff will have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

Online safety

It is essential that children are safeguarding from potentially harmful and inappropriate online material. Ensuring online safety is a running and interrelated theme and at Kenton College online safety is reflected as required in all relevant policies and considered whilst planning the curriculum, teacher training, and any parental engagement.

The school has a clear policy on the use of mobile and smart technology including appropriate filtering and monitoring on school devices and school networks.

Filtering and Monitoring

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include:

- o Physical monitoring

- o Live software monitoring

- o Monitoring user logs

- o Monitoring individual devices

- We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures.

- Each term (at least) our designated safeguarding lead, along with our IT team, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

- All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- 1) Content: being exposed to illegal, inappropriate or harmful material; for example pornography, misinformation, disinformation, conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism.
- 2) Contact: being subjected to harmful online interaction with other users; for example: child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- 3) Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- 4) Commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Kenton College is doing all that it reasonably can to limit children's exposure to the above. The school's governing body ensures appropriate filters and appropriate monitoring systems are in place. The Headteacher/DSL are notified if the filter has stopped access to a website which would be deemed as potentially harmful/inappropriate. The DSL/Headteacher approves all applications prior to pupil roll-out having assessed them for inappropriate content. If a staff member becomes concerned about a pupil or staff member's online activity, then they should report their concerns following safeguarding reporting procedures or follow the whistleblowing procedures.

No child in school should have access to a mobile phone/SIM-enabled devices during the school day; children who break this rule and bring a mobile phone or SIM-enabled device to school will have it confiscated and collected by parents/guardians at the end of the day.

Staff are not to use any mobile phones in areas where or when children are present. Our E-Safety Policy covers

all aspects of online safety and is compliant with the statutory guidance on online safety & peer-on-peer abuse as set out in KCSIE 2025, as well as taking into account the DfE guidance 'Teaching Online Safety in Schools' (December 2023).

This policy is available from our website. Where children are being asked to learn online at home, the school sends guidance home to both pupils and parents about our online safety expectations.

- All our staff have taken part in annual cybersecurity training.

Procedures when a Member of Staff, DSL or Headteacher Faces Allegations of Abuse

Introduction

Allegations that a member of staff has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by:

- parents, guardians or relatives
- the abused pupil
- other members of staff
- other pupils
- a third party

An allegation of such seriousness would normally be made directly to the Headteacher; but if another member of staff is told first, they will ensure that both the DSL and Headteacher are informed immediately. If the Headteacher is unavailable – or if the allegation concerns the Headteacher – the person receiving the allegation will immediately inform the Safeguarding Governor Lead and the Chairman of Governors.

Since Kenton College cannot access the services of a Local Authority Designated Officer (as would be the case in the UK), the Headteacher will advise on appropriate course of action in conjunction with the MDT. Both the Headteacher and the DSL must be informed immediately of any disclosure.

Anonymous Allegations

If the allegation of child abuse is made anonymously and names both a member of staff and a child, the situation will be handled in exactly the same way as if the identity of the person making the allegation was known. Where the allegation names the member of staff but not the child, the member of staff will be interviewed and asked for their version of events. It may be appropriate to establish a mentoring or review programme for that individual, or to provide them with further training. A record will be kept on the individual's personal file.

Procedures

The Headteacher, Safeguarding Governor Lead or DSL will respond immediately and sensitively to the legitimate concerns of the victim and his or her family. This will involve the collaboration and assistance of the MDT. They shall undertake to:

- take any allegation of abuse involving a member of staff very seriously
- establish the facts before jumping to any conclusion

- inform the member of staff honestly of the allegation that has been made and advise them to contact one of the Deputy Heads and/or legal representation for advice and support
- inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place

Where the facts suggest that there may be reasonable grounds for suspecting actual abuse, or grooming of a child, or other criminal behaviour, the Headteacher or the Safeguarding Governor Lead will always:

- invite the Police to conduct investigations
- involve the Board of Governors and seek legal representation
- consider suspending the member of staff or volunteer concerned
- seek advice from the Director of Children's Services
- seek advice from the MDT

Support for the Pupil

Our priority is to safeguard the young people in our care. We will give them all the support that we can to a pupil who has been abused. The Headteacher, along with the DSL, will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, guardians, relatives or agencies identified as capable of supporting strategies that will be appropriate.

Under no circumstances should the pupil be dismissed or expelled from the school pending such an investigation.

Suspension

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about their conduct. Even so, it is a serious step, and the Board of Governors will take legal advice before initiating suspension procedures, and will only suspend a member of staff where:

- there is a serious risk of harm to the child
- the allegations are so serious as to constitute grounds for dismissal, if proven
- the police are investigating allegations of criminal misconduct

We recognise fully that we have a duty of care towards all our staff, and we will always:

- keep an open mind until a conclusion has been reached
- interview a member of staff before suspending them
- keep the member of staff informed of progress of the investigation

Any member of staff who is invited to a meeting whose outcome is likely to result in their suspension, is entitled to be accompanied by a friend, a Deputy Head or a legal representative.

Alternatives to Suspension

We will always consider whether an alternative to suspension might be appropriate. Possibilities include:

- sending the member of staff on leave

- giving the member of staff non-contact duties
- ensuring a second adult is always present in the classroom when they teach

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned. Every investigation into allegations of child abuse will be completed. We will not entertain any compromise agreements suggested by a member of staff in which they agree to resign if the school agrees not to pursue any disciplinary action.

Length of Investigatory Process

The School recognises that everyone's interests are served by completing any investigatory process as swiftly as possible. The Board of Governors will aim to spend as little time as is compatible with fair and impartial processes on the investigatory process. Every investigation will be completed within one month.

Referral of Outcomes

In the case of staff recruited from the UK or staff that may work in the UK in the future, we have a statutory legal duty to refer an individual, where there is risk that they may harm, or has caused harm to children, to the Independent Safeguarding Authority (ISA) & the DBS within one month of the individual's dismissal or resignation because they have been considered unsuitable to work with children. Reports concerning members of staff, volunteers, contractors or pupils are made by the Headteacher. If the Headteacher is involved, the report is made by the Chairman of Governors. In the case of foreign nationals, the report will be made to their embassy. For Kenyan nationals, the report will be made to the Ministry of Education.

The School will also consider making referrals to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate. A referral would be made when termination was a result in the following circumstances:

1. Unacceptable professional conduct
2. Conduct that may bring the profession into disrepute
3. A conviction, at any time, for a relevant offence

In the event of an allegation against teachers, the School will make every effort to maintain confidentiality and guard against unwanted publicity. This will apply up to the point that the person is charged with an offence, or the UK Department for Education (DfE)/NCTL publish information about an investigation or decision in a disciplinary case.

Recording Allegations of Abuse

We will record all allegations of abuse, and our subsequent actions, including any disciplinary actions, on an individual's file. A copy will be given to the individual and they will be told that the record will be retained until they reach statutory retirement age, or for ten years, if that is longer.

Handling Unfounded or Unsubstantiated Allegations

The child:

A child who has been the centre of unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. We will liaise closely with an Educational Psychologist to ensure a professional programme of support. We shall be mindful of the possibility that the allegation of abuse was an act of displacement, making abuse that is actually occurring within the child's own family and/or community.

However much support the child may need in such circumstances; we need to be sensitive to the possibility that the aftermath of an unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher. In such circumstances, we may conclude that it is in the child's best interests to move to another school. We would do our best to help them have as smooth a transition as possible, working closely with the parents or guardians.

The member of staff:

A member of staff could be left at the end of an unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun them on the grounds of 'no smoke without fire'.

If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; we recognise that they are likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the school community. A short sabbatical or period of re-training may be appropriate.

Allegation of Abuse of a Child who is not a Pupil at the School

If we were given information that suggested a member of staff was abusing a child who was not a pupil of Kenton College, we would immediately pass such information to the school at which the child attends, for them to handle. We would then interview the member of staff and formally advise them of the allegations, making it clear that the school would not play any part in the investigatory process. They would be advised of the possibility of facing suspension, re-assignment to other duties etc. in exactly the same way as if the allegation had involved a school pupil. If the allegation subsequently proved to be unfounded, they would be given full support by the school in resuming their career.

Allegations Involving the Headteacher or DSL and Safeguarding Lead Governor

The Chairman of Governors should be told at once by the Deputy Head or DSL of any allegation involving the Headteacher. They will obtain legal advice before proceeding to the steps outlined previously. The Headteacher will normally be suspended for the duration of the investigatory process and asked to vacate her school residence, and the Nominated First Deputy would be made acting Head until the conclusion of the investigation and resolution of the issue.

The Headteacher should similarly be told at once of any allegation involving the DSL. The Safeguarding Governor Lead should normally be informed on the same day, and legal advice obtained. The DSL will normally be suspended for the duration of the investigatory process and asked to vacate their school house. The Headteacher should be made acting DSL until the conclusion of the investigation and resolution of the issue.

PART 4: APPENDICES

Appendix A: Low Level Concern Reporting Form

Low-Level Concern Form

This form can be used to share any concern with the Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

PLEASE COMPLETE PAGE 1 ONLY (PAGE 2 IS FOR DSL/HEADTEACHER/CHAIR OF GOVERNORS)

Details of CONCERN :

Name of Staff member :	Department and Role :
Signed :	Time and Date :

PASS THIS FORM TO THE HEADTEACHER (OR FIRST DEPUTY IF THE HEADTEACHER IS ABSENT)

Received by :	
At [time] :	Date :

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO ☐ - Give a brief but valid reason/explanation for not;

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION TAKEN :

Signed :

Dated :

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

Appendix B: Safeguarding Concerns Reporting form

If staff have a safeguarding concern about a child in our school, they should submit the incident on CPOMS, alerting the DSL and dDSL. If an adult does not have access to CPOMS they should complete the form below.

Recording Form for Safeguarding Concerns

Adults who do not have access to CPOMS must fill in this form and pass it to Rachel Hulland if they have a safeguarding concern about a child in our school. If Rachel Hulland is absent, please pass the form to Kelly Andola or Sally Weston.

Information Required	Enter Information Here
Full name of child	
Date of birth	
Class/tutor group	
Your name and position in the school	
Nature of concern/disclosure <i>Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said.</i> <i>[Ensure that if there is an injury this is recorded (size and shape) and a body map is completed]</i> <i>[Make it clear if you have raised a concern about a similar issue previously]</i>	
Time & date of incident:	
Name and position of the person you are passing this information on to	
Your Signature	
Time and date form completed	

