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 2026**
Next review	**October 2027**
Related policies/documents	**'Keeping Children Safe in Education (2026), Staff Code of Conduct, Anti-Bullying, Whistleblowing, Safer Recruitment, Missing Child, Behaviour, E-Safety, ICT and Wellbeing.**

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 2026)
- Disqualification under the Childcare Act 2006 (September 2018)
- Working Together to Safeguard Children (December 2023 – updated in February 2024)
- Relationship and Sex Education (July 2026) (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 (2026) 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
Ed Thompson	Designated Safeguarding Lead	0704825634	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 2026) 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 (2026).
- 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 (including administrative, site, catering, and support teams) and governors read and fully understand at least KCSIE (2026) Part One in full 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 (2026). 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 2026).
- 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 for being alert to the signs of abuse and the procedures contained in this policy. This briefing is led by the DSL, or DDSL in their absence.

All staff will undergo regular training through EduCare courses. 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 One of "Keeping Children Safe in Education" 2026
- 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 (2026), 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 (2026) 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 (2026). 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	Ed Thompson
b. Head	Sally Weston
c. Safeguarding Governor	Cosima Wetende
d. HR Professional	Susan Mungai
e. Legal Advisor	Cosima Wetende
f. Local Community Representative	Gladys Wahinya

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

Culture of Openness: Kenton promotes a transparent culture where all staff, coaches, volunteers, and contractors are expected to report any inappropriate behavior—concerning themselves or others—no matter how small, aligning with *Keeping Children Safe in Education (2026)*.
Early Problem Identification: Concerns that do not meet the formal harm threshold must still be reported to allow for early intervention and minimize risks to children.
Focus on Behavior, Not Terminology: Reporting is designed to be a "neutral" process. Regardless of whether a discloser uses the word "concern" or "allegation," the focus remains entirely on assessing the actual behavior described rather than the terminology used.
Clear Reporting Line: Staff do not need to judge whether a behavior meets the harm threshold. They simply need to report the concern, and the Headteacher (consulting with the DSL, senior leaders, or Governors) will determine the appropriate response.

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

All low-level concerns should be filled in using the form on Google Classroom or by scanning the QR code on the poster up in the staffrooms. The form will alert the Headteacher.

Responding to low-level concerns

The Headteacher (or SLT delegate) handles all low-level concerns promptly by speaking with the reporter, subject (unless advised against), witnesses, and external employers (for non-staff/contractors).
Low-level concerns do not use formal harm-threshold labels (e.g., substantiated/false) and result in: no action (meets Code of Conduct), management/training (low-level concern), or escalation to the DSL/disciplinary procedures if serious or repeating.

Written records of all discussions, decisions, and actions are securely kept and periodically reviewed to spot patterns of behavior.
Reporter anonymity is protected as far as possible, though complete confidentiality cannot be guaranteed during formal disciplinary or criminal investigations. Staff are encouraged to self-report compromising situations.
If conduct is deemed compliant, feedback is given to both parties individually. Low-level concerns are excluded from job references unless escalated to the DSL and substantiated. Governors receive regular updates and sample reviews to oversee compliance.

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 (2026) 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 child-on-child 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 child-on-child 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 (2026) 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. Keeping Children Safe in Education (2026) 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 & Continuum of Harmful Sexual Behaviour (HSB)
- Child financial exploitation
- Child criminal exploitation
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Female Genital Mutilation (FGM)
- Preventing radicalisation
- child-on-child abuse
- Sexual violence and sexual harassment between children in schools
- Upskirting
- Online abuse
- Modern slavery
- Mental health
- Prejudice-Based Harm
- Serious & Financial Violence
- Gender-Questioning & LGB Support

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, 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 (2026) 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 (2026) 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

Staff must maintain strict confidentiality regarding child protection issues to protect pupils and staff and avoid compromising evidence. Concerns must be reported directly to the DSL, who shares information strictly on a "need-to-know" basis. Staff should be proactive in reporting concerns early.
Under the Data Protection Act 2019 and GDPR, safeguarding children is a valid legal condition for processing and sharing sensitive personal data. Consent is not required to share information if obtaining it is impossible, unreasonable, or would place a child at further risk.
Data protection fears must never block safeguarding efforts; as a data controller, the school may share necessary information with third parties like 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: WIDER 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 & Access Control: Child abduction is the unauthorized removal/retention of a minor by parents, acquaintances, or strangers. Kenton College mitigates this through strict site security: requiring pre-approved car stickers for vehicle entry, mandatory identity checks and escorts for all visitors, and requiring parents to explicitly notify the Front Office of any changes to pick-up arrangements.

Child Exploitation (CSE, CCE, Financial, & County Lines): Exploitation occurs when individuals leverage power imbalances (age, gender, intellect, financial resources) to manipulate, groom, or coerce minors into sexual

acts, criminal activity, or financial control, both online and offline. This includes "County Lines" (gangs exploiting children to transport drugs via dedicated phone lines, often using violence or debt coercion). Staff monitor key indicators, including unexplained gifts/possessions, associating with risky peers, drug/alcohol misuse, sudden emotional changes, and irregular attendance or going missing.

Preventing Radicalisation (Prevent Duty): Schools have a statutory duty to protect children from being drawn into terrorism or extremist ideologies that oppose fundamental values (democracy, rule of law, individual liberty). DSLs undergo Prevent training, and IT systems use filtering controls. Staff are trained to recognize warning signs—such as secretiveness around internet use, isolating from friends, rejecting usual activities, hostility toward diverse peers, talking from scripts, or expressing sympathy for extremist groups—while noting these can overlap with normal teenage behaviors.

Female Genital Mutilation (FGM) & Honour-Based Abuse (HBA): FGM (illegal non-medical procedures altering female genitalia, primarily affecting girls aged 5–8) and HBA (e.g., forced marriage, breast ironing) are illegal forms of child abuse. Staff look for risk factors (e.g., travel to high-risk countries like North/East African nations during long July–August summer holidays) and post-procedure physical symptoms (difficulty sitting/walking, long times in the bathroom, urinary issues). Teachers have a direct legal obligation to report any discovered cases of FGM directly to the police.

Mental Health & Domestic Abuse: Domestic abuse (physical, sexual, emotional, coercive, or economic abuse between connected people over 16) directly impacts children as victims in their own right, causing lasting emotional and educational harm. Staff monitor mental health shifts as potential indicators of abuse or trauma. Serious mental health concerns (such as self-harm or suicidal ideation) are treated as safeguarding issues, logged via CPOMS, and escalated to the DSL and Heads of Year to arrange support through the school doctor and counsellor.

Child-on-Child Abuse & Upskirting: Peer abuse takes many forms, including bullying, physical violence, intimate partner abuse, hazing, non-consensual sharing of nude images, forced sexual activity, and upskirting (taking unauthorized photos under clothing, which is a criminal offense). School procedures focus on: 1) removing children from immediate harm, 2) investigating via multiple sources (staff, peers, families, GPs), 3) resolving and communicating with parents, 4) educating the cohort on key learnings, 5) providing follow-up support for victims and perpetrators, and 6) sensitizing parents to warning signs.

Serious Youth Violence & Contextual Safeguarding: Early intervention (conflict resolution curriculum, challenging aggression, transition management) helps prevent behaviors like knife carrying or gang involvement. Contextual safeguarding requires assessments to consider threats arising from the child's wider environment and social settings outside school grounds, working alongside local partner agencies.

Homelessness & Attendance Monitoring: Irregular attendance, truancy, or missing school altogether are primary indicators of potential neglect, abuse, or exploitation. The school tracks attendance closely, maintains at least two up-to-date parent/carer contact numbers, and follows up on unexplained absences immediately. Staff also report signs of family homelessness risks (e.g., severe debt, rent arrears, domestic abuse) urgently to the DSL.

Missing Child Procedures (On-Site & Off-Site): If a child goes missing on campus, SLT is notified, an immediate building and grounds search is ordered, perimeter security is checked, and if unfound within 20 minutes, parents and police are alerted. For off-site incidents, staff conduct an immediate headcount, halt movement, engage venue security, search the local area, assign a supervisor for the remaining group, notify the Deputy Head Pastoral/Headteacher, and contact emergency services and parents.

Looked After Children & Vulnerable Groups: Children in state care (often due to prior abuse or neglect) receive tailored safeguarding support. Designated staff maintain accurate records regarding their legal status, care arrangements, and delegated carer authority to ensure their safety and well-being.

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.

• At least annually, 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, conducting a formal review. 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, generative AI & deepfakes. 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. AI generated child sexual abuse material (CSAM) and AI driven extortion (FMSE).
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. Interactions with AI chatbots,

companions and generated content.

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.

All sharing of nude/semi-nude images (real or AI generated, consensual or non-consensual) requires a safeguarding response.

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 and child-on-child abuse as set out in KCSIE 2026, 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. The DSL has overall responsibility for e-safety.

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.