



Peponi School

Child Protection & Safeguarding Policy

Introduction

Peponi School is committed to safeguarding and promoting the welfare of all the pupils in its care. The following policy document outlines our approach to achieving this. The policy aims to make explicit the School's commitment to the development of good practice and appropriate procedures. The policy applies to all on and off-site activities undertaken by pupils whilst they are the responsibility of the School.

Defining key terms

'Child Protection' is taken to refer to the obligation which the school has to protect all pupils from any form of identified risk or abuse. **'Safeguarding'** extends to the prevention of harm and the promotion of wellbeing of children. 'Working Together to Safeguard Children, 2015 (United Kingdom)' defines safeguarding as,

'The process of protecting children from maltreatment, preventing impairment of their health and development, ensuring they are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best life chances'.

This Policy and its related procedures has been prepared in compliance with and having regard to the Education Acts; the Children Act 2004; the Education (Independent School Standards) Regulation 2014; "Working Together to Safeguard Children 2015"; "Keeping Children Safe in Education 2016" and "Protecting children from radicalisation: the prevent duty 2015"; Ofsted guidance. This policy should be read in conjunction with the School's Anti-Bullying Policies, Whistleblowing Policy, Health & Safety Policy and its Safer Recruitment Policy (all available to staff on the School's intranet).

Staff are required to confirm that they have read this policy and the School's H R Department keep a record of this.

At Peponi School we must ensure that we:

- take all reasonable measures to ensure that risks of harm to children's welfare are minimised;
- take all appropriate actions to address concerns about the welfare of a child or children, working under local policies and procedures in full partnership with other local agencies and the law. (Kenya's Children's Act: 2001 revised in 2016).

There are five key outcomes in a school's duty to safeguard and promote the well-being of all pupils.

1. Helping children to be healthy.
2. Protecting children from abuse or neglect and helping them to stay safe.
3. Helping children to achieve well-being and enjoy what they do in a safe environment with effective care.
4. Helping children to make a positive contribution in their immediate environment and in the broader society.
5. Helping children to achieve the best outcomes and economic well-being.

Everyone who comes into contact with children has a role to protect them from neglect and abuse. It is the duty of all members of staff, both teaching and support staff, to play an active role in ensuring their safety and promoting the welfare of all the pupils in our care. All members of staff are expected to be aware of, and to follow these published Child Protection procedures. In particular they need to be aware of their duty to report concerns and the appropriate procedures to follow, guidance for identifying signs of possible abuse and issues regarding confidentiality. Staff should also be aware of the importance of these procedures in protecting themselves from the possibility of allegations of harm that could be raised by a pupil.

Peponi School is committed to providing a safe and secure environment for pupils, staff and visitors and has measures to deliver this, which include (but not exhaustively): designated safeguarding leads; careful governance; use of the curriculum; safer recruitment procedures; processes for disclosure and referral; codes of conduct for staff and pupils; first aid and medical plans; and training. **This policy sets out these and other areas in detail.**

1. Key Safeguarding Contacts

Designated Safeguarding Lead for the School	
Collins Kaunda – Housemaster, Physics Teacher	+254722864827 ckaunda@peponischool.org
Deputy Designated Safeguarding Lead	
Karen Coyne – School Counsellor	+254705909331 schoolcounsellor@peponischool.org
The Safeguarding Director	
Mrs Nyokabi	safeguardingdirector@peponischool.org
Childline Kenya	Toll-free number 116 Whatsapp: 0722 116 116 116@childlinekenya.co.ke
Outside contacts	David Marshall - +254 734775292 Susan Gitau - +254 724473011 Dr Gitonga - +254 722444094

2. Policy Aims

The purpose of this policy is to:

- Describe what should be done if anyone in the School has a concern about the safety and welfare of a pupil who attends the School
- Identify the particular attention that should be paid to those pupils who fall into a category that might be deemed “vulnerable”
- Clarify how pupils will be kept safe through the everyday life of the School
- Identify the names of responsible persons in the School and explain the purpose of their role
- Set out expectations in respect of training
- Set out expectations regarding record keeping
- Outline how the implementation of this policy will be monitored

Record Keeping and Confidentiality

Child Protection records are kept securely by the Deputy Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Leads, his Deputies and the Headmaster of the School. Staff are aware that they must make a record of child protection issues and events as soon as possible and that these records must be signed and dated. Staff also recognise that they must not promise confidentiality when dealing with child protection issues. If a pupil discloses concern regarding a child protection matter this should be documented by the member of staff who receives the disclosure. This must be passed on to the Headmaster and / or Second Master as soon as possible.

Roles and Responsibilities

The Headmaster and the Chair of the Child Protection Committee

As in all areas of school life, the Headmaster assumes overall responsibility for child protection issues. The Headmaster and Chair of the Child Protection Committee are responsible for instructing and guiding staff and senior pupils on Child Protection matters. They brief all new staff on arrival and school prefects on appointment. The Chair of the Child Protection Committee assumes responsibility for reviewing and updating the school’s Safeguarding Policy. He/she will also ensure that staff have access to the procedures and an appropriate understanding of them.

School Nurses

Working closely with Housemasters / Housemistresses, the School Nurses play a crucial role in monitoring, on a regular basis, the general health and wellbeing of pupils in their Houses.

The School Counsellor

The School Counsellor is available on full time basis to offer support and advice to pupils as well as other outside professional agencies.

Child Protection and Safeguarding in practice at Peponi School

Education and Prevention

A range of child protection and broader pastoral issues are addressed through the curriculum. In this area PSHE, English and Drama are important. Housemasters / Housemistresses regularly speak to pupils in House groups emphasising our expectations of them and reinforcing the school's Anti-Bullying Policy. Tutors will also cover a number of related issues with their tutees. In addition, there are many broader moral, spiritual, social and cultural themes raised in school assemblies and registrations. Every employee has a responsibility to protect pupils at the school from abuse. They should be alert to the definitions and indicators of abuse as well understanding the school's child protection procedures. Senior pupils, such as prefects, who have positions of responsibility over other pupils are briefed on appropriate procedures dealing with safeguarding and child protection, including their responsibility over other pupils on action to take on receiving an allegation of abuse.

Internet and Mobile Phones

Information and communication technology has revolutionised almost every aspect of modern life. Unfortunately, it has also given rise to new types of abuse, including cyber-bullying (where children or adults send insulting or abusive texts or emails). Children and adults are also able to take photographs and videos on mobile phones and rapidly distribute them to anyone of their choosing. Some young people film physical or sexual assaults and distribute the images to friends and upload them onto websites. Peponi School sets out clear rules regarding the safe and appropriate use of ICT within its published School Rules, ICT, Internet and Portable Devices, E-Safety and Anti-Bullying policies, some of which are detailed below. Safe and appropriate use of ICT is discussed with pupils through the PSHE programme.

Missing Pupil Policy

There is a Missing Pupil Policy in place at the school for searching for and, if necessary reporting, any boarder missing from the school. This is detailed further below.

Education, Staff Training and Prevention

Child Protection issues figure prominently in many areas of staff training and development. All new staff undertake a structured induction programme where issues of child protection and safeguarding are explained and clarified. Staff have a moral as well as legal obligation to be alert to the signs of abuse, and act appropriately within their roles to prevent abuse and respond to concerns or disclosures regarding abuse – these procedures are detailed further below.

Child protection and safeguarding – guidance for staff

Signs and categories of abuse or neglect

The following categories of abuse are not mutually exclusive and children may be subject to more than one form of abuse.

Abuse A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children

Physical Abuse A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Indicators of physical abuse may include bruises, bite marks, burns and cuts. In such circumstances children may be unwilling to participate in games and may attempt to cover up affected areas.

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

Sexual Harassment: Sexual harassment is defined as "Unwanted conduct of a sexual nature," that can occur online and offline.

Sexual harassment is likely to:

- Violate child's dignity,
- Make them feel intimidated
- Degrade or humiliate
- Create a hostile, offensive or sexualised environment

Sexual Harassment can include

- Sexual comments, such as: making lewd comments; making sexual remarks about clothes and appearance and inappropriate name calling
- Sexual jokes or taunting
- Physical Behaviour – such as: deliberate and unwanted contact; displaying pictures; photos and drawings of a sexual nature
- Online sexual harassment which might include: non-consensual sharing of sexual images and videos (Sexting); inappropriate sexual comments on social media; exploitation; coercion and threats.

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

Child Sexual Exploitation (CSE) CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under

the age of 18 is not legally capable of consenting to sex (it is statutory rape in Kenya) or any other type of sexual touching. Sexual activity with a child under 18 is also an offence. Furthermore, **Kenya does not have a close-in-age exemption**. Close in age exemptions, are put in place to prevent the prosecution of individuals who engage in consensual sexual activity when both participants are significantly close in age to each other, and one or both partners are below the age of consent. Because there is no close-in-age exemption in Kenya, it is possible for two individuals both under the age of 18 who willingly engage in intercourse to both be prosecuted for statutory rape. Similarly, no protections are reserved for sexual relations in which one participant is a 17 year old and the second is a 18 or 19 year old. It is an offence for a person to have a sexual relationship with a 16 or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non-consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

'Sexting' Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting' covers the incidents where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures in Peponi's Sexting Policy. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety.

Female Genital Mutilation (FGM) FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in Kenya and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

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

Identification of child abuse is difficult and will frequently require both social and medical assessment. As well as obvious non-accidental injuries, injuries which are not consistent with the explanation given and incidents reported by the child or others, the following signs may be significant in the light of other concerns:

- Physical harm: Bruising; scarring; bandages/plasters; rubbing part of the body; cigarette burns; abstains from physical activities and resists using the changing room at school.
- Psychological abuse/harm: Apathy; withdrawal from social contact; loss of enthusiasm/energy; seeming to be preoccupied; tearful; misses school or is frequently late.
- Neglect: Socially withdrawn; untidy/unkept; poor time-keeping; Infrequent mention of parents/family life; possibly slow to develop emotionally; overly self-reliant.
- Sexual abuse: Delayed or no learning progress, inappropriate sexual behaviour, low self-esteem, unease or unusual behaviour with adults, sexualised drawings, self-injury and distinct changes in behaviour.
- Child sexual exploitation: Going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older girlfriends or

boyfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour.

It is important that these factors should not be seen in isolation but considered within the overall context. The School recognises that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label.

All staff should be aware of the signs of abuse and neglect so that they can identify children who may be in need of help or protection. The School recognises that beyond the signs listed above colleagues should also be aware of:

- faith abuse,
- forced marriage,
- gangs and youth violence,
- trafficking, and
- gender based violence against women and girls.

The School recognises that children are capable of abusing their peers. **Peer on peer** abuse can take many forms and some types can be gender specific. It can include bullying (including cyberbullying), gender based violence and assault, sexual harassment and abuse and sexting. Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. (See also the School’s Anti-Bullying Policies, which are available on the policies page of the School’s website.)

Preventing Radicalisation

The Counter-Terrorism and Security Act 2015 (UK) places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism (the ‘Prevent Duty’) and hate crimes. For more details please refer to the Preventing Radicalisation Policy. Young people can be exposed to extremist influences or prejudiced views (in particular via the internet and other social media) and schools can help to protect children from them.

The School:

- Communicates and promotes the importance of the Prevent duty to staff.
- Provides training to enable staff: (a) to recognise the engagement, intent and capability factors which indicate that a person may be vulnerable to being drawn into terrorism or at risk of radicalisation (including changes in a pupil’s behaviour); (b) to challenge extremist ideas which can be used to legitimise terrorism; and (c) to know when and how to make a referral to the relevant agencies.
- Builds pupils’ resilience to radicalisation by: (a) promoting their spiritual, moral, social and cultural development; (b) by promoting democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths; and (c) helping pupils to acquire the knowledge, skills and understanding that they need to play a full and active part in society.
- Teaches pupils about on-line-safety and the safe use of social media, manages internet access and ensures that there are suitable filtering arrangements in place.
- Provides a broad curriculum and ensures that pupils are offered a balanced presentation of opposing views in relation to political issues.
- Ensures that visiting speakers are suitable and that they are appropriately supervised when at the School.
- Assesses the risk of its pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- Works in partnership with the police, local authorities and other agencies involved with the implementation of the Prevent Strategy (as suitable in Kenya).
- Engages effectively with parents (including assisting and advising parents who raise concerns).

School Approach

- We involve staff and pupils in the review of this policy and in the development of codes of conduct and communicate these to parents.
- We liaise with agencies in the statutory, voluntary and community sectors that are active in supporting families.
- Where a pupil needs additional support from one or more agencies, we assist the agencies involved (CID and Children’s Department, Government of Kenya) to conduct an inter-agency assessment using local processes
- We are alert to the needs of parents/carers who do not have English as their first language.
- The Designated Safeguarding Lead for the School:
 - ensures that all staff are aware of this policy, have read all necessary documentation and have received all necessary training;
 - ensures this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made;
 - acts as a source of support, advice and expertise to staff on matters of safeguarding;
 - provides a lead on regular review of current safeguarding cases
 - refers cases of suspected abuse to CID and Children’s Department (Government of Kenya) where appropriate;
 - coordinates with the Headmaster as the first point of contact for external agencies pursuing Child Protection investigations and co-ordinates the School’s representation at Child Protection conferences and Core Group meetings (including the submission of written reports for conferences);
 - links with CPAN to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
 - chairs the Child Protection Committee;
 - ensures the School discharges its obligations in relation to the Prevent Duty under the Counter-Terrorism and Security Act 2015, is the main point of contact for parents, pupils, staff and external agencies in all matters relating to Prevent and arranges suitable training for staff;
 - ensures this policy and its implementation is reviewed annually by Directors;
 - provides a termly report to the Board of Directors and/or the Directors’ Safeguarding Committee, outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

The Role of the Board of Directors

The Directors’ role is to:

- comply with their safeguarding duties under legislation and ensure that the policies, procedures and training in the School are effective and comply with the law at all times;
- ensure that the School contributes to inter-agency working in line with statutory guidance (including “Working Together to Safeguard Children” and “Keeping Children Safe in Education”);
- ensure that the School safeguarding arrangements take into account best practice practices adopted from CPAN;
- ensure that pupils are taught about safeguarding (including on-line safety) through PSHE;
- nominate a Safeguarding Director to act as the lead Director for child protection and safeguarding issues in the School; and review this Policy and the effectiveness of its implementation annually.

The Safeguarding Director:

- is the lead Director for child protection and safeguarding issues in the School;
- chairs the Directors’ Safeguarding Committee;

- meets with the Designated Safeguarding Lead on a regular basis to monitor both the volume and progress of cases where a concern has been raised to ensure that the School is meeting its duties in respect of safeguarding;
- keeps fully abreast of the guidance available for safeguarding;
- visits the School to monitor its procedures; and liaises with CPAN and/or partner agencies on issues of child protection and allegations of abuse against the Master and/or the Designated Safeguarding Lead.

The Directors review how children are taught about safeguarding in PSHE lessons (including safe use of electronic equipment and access to the internet).

Recruitment (Staff, Volunteers and Contractors)

- The School is committed to safer recruitment and has adopted procedures and processes (including its recruitment policy and safeguarding checks protocols) that are intended to help deter, reject or identify people who might abuse children.
- The Peponi Safer Recruitment Policy is available to staff on the intranet.
- We have regard to the Department for Education's statutory guidance for schools about the employment of staff disqualified from childcare "Disqualification under the Childcare Act 2006", which also contains information about 'disqualification by association'

Recording and reporting concerns or disclosures regarding abuse

All staff are instructed that if they have any concerns about a child (including concerns regarding possible peer abuse) they must report the matter straight away to Designated Safeguarding Lead or the School's Deputy Designated Safeguarding Leads or directly to the Headmaster. Staff may become concerned about the possible abuse of a child either through their own observations or through direct disclosure. It is important that they act promptly to report such concerns.

All concerns and allegations must be taken seriously and considered with an open mind and without prejudice. You must not take the decision as to whether or not abuse has taken place. Where a pupil discloses information about abuse, listen carefully but do not undertake an investigation. Limit your questions to establishing what has allegedly taken place. Employ open questions only and on no account should suggestions be made as to alternative explanations for their worries. Always make detailed notes whenever a matter of alleged abuse is being discussed. This should be done as soon after the event as possible but not during it. The date and time should be carefully noted and the account signed.

Concerns regarding abuse of any sort should be reported to the Headmaster. If the Headmaster is absent, the allegation should be passed to the Second Master. If the allegation concerns the Headmaster, the allegation should be passed to the Second Master, who will immediately inform the Chair of the Board of Directors without notifying the Headmaster first. If support staff are involved then the Bursar will also be informed.

Allegations of abuse by one or more pupils against another should follow the above procedures and be reported, in writing, to the Second Master.

Concerns about whistle blowing

Staff may feel concerned or nervous about reporting allegations of whose truth they are uncertain, particularly when such allegations involve another member of staff. For more details please refer to Whistleblowing Policy.

Reasons for reporting

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour.
- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent becoming implicated yourself.

What stops people from reporting concerns

- Fear of starting a chain of events that spirals beyond the individual's control.
- Fear of getting it wrong and the repercussions of this.
- Fear of damaging a colleague's career.
- Fear of resentment from other colleagues.
- Fear of not being believed or taken seriously.

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of the Second Master or Headmaster. Although this can be difficult in some circumstances this must never impede an individual from putting issues of child welfare first. The school will provide immunity from retribution or disciplinary action for any member of staff who discloses information in good faith. Try not to think 'What if I am wrong?' but rather 'What if I am right?'

Confidentiality

Members of staff should never offer absolute confidentiality to anyone wishing to discuss issues of pupil welfare. They should however reassure the person that whatever is revealed will be handled with sensitivity, tact and on a 'need to know' basis. Reassurance should be given that all steps will be taken to protect the informing individual from any retaliation or unnecessary stress that might be feared once a disclosure is made. All staff should be aware that there is a statutory requirement to report information about such matters as child abuse.

Investigation and Response

Any written allegation will be considered by the Headmaster and/or the Second Master and the Child Protection Committee will be consulted when appropriate. This would typically be when there may be a need to involve outside agencies or where further investigation, family liaison or counselling is needed. At all times a written log of meetings and decisions taken must be kept. If the allegation involves a member of staff, the Headmaster must decide whether there is need for an investigation and the member of staff concerned will be informed of his decision. If the Headmaster believes that the allegation is without foundation, he should inform the member of staff of the allegation and the fact that no further action is to be taken (although the Complaints Procedure may still apply in some cases). In any such meeting or conversation the member of staff may be accompanied by a friend. The parents should also be informed. Counselling for both the member of staff and the pupil may be considered appropriate. A report must be written.

Investigations into an allegation involving a member of staff

If an investigation is initiated the member of staff will be informed accordingly. He or she will be advised that details of the investigation will be recorded in writing. The member of staff allegedly involved should be acquainted with this procedure and should be informed of all measures decided upon throughout the investigation, including during possible suspension periods. Delays in any investigation should be kept to the minimum.

In all circumstances dealing with specific allegations of abuse the Headmaster will consider involving the police and / or local authorities.

The member of staff allegedly involved will be informed by the Headmaster of the allegation and of his response to it, in the presence of a witness. The time and date will be recorded. Advice on legal assistance and counselling for the member of staff will be discussed. The Chair of the Board of Directors will be informed. The Headmaster is responsible for informing the parents of the pupil involved. On receiving the written allegation or at any subsequent stage of the enquiry the Headmaster may suspend a member of staff from duty. Suspension should be regarded as a necessary procedure rather than a judgement on the school's part. A member of staff suspended during the course of an inquiry will receive full pay. It is also recognised that a suspended member of staff should receive support, including help in finding advice and, if need be, legal representation. Social contact with colleagues need not be precluded unless it is likely to be prejudicial to the investigation.

The Headmaster may consider it proper for the member of staff to vacate their school accommodation during the inquiry. In this case the Headmaster may feel it necessary to re-house, at the school's expense, the member of staff allegedly concerned. Likewise, the Headmaster may decide that the complainant should remain at home during the investigation. During the course of the investigation it is for the school to inform parents of other pupils and to

deal with press enquiries. It is also the school's duty to take appropriate care over the welfare of any pupils who are involved. Counselling of any staff allegedly implicated will be considered at this stage.

The Outcome

The result of the investigation will be made known in writing by the Headmaster to the member(s) of staff allegedly involved. In the event of guilt either through law or by the decision, based on evidence, the Headmaster, in communication with the Chair of the Board of Directors, will decide on further action if external authorities have not already taken action. In instances which might involve dismissal and in which action has not already been taken by external authorities, the case will be assessed at a formal hearing involving a panel of two Directors and the Headmaster. The process of appeal against a decision made by the Headmaster or by a panel at a hearing will be made clear. The member(s) of staff allegedly involved is/are encouraged to use the professional bodies who could assist in providing legal advice, insurance and professional assistance. In the event of a decision in favour of the member(s) of staff allegedly involved, the Headmaster will decide on the future of those making the allegations. He will inform the member(s) of staff allegedly involved of the decision, reiterate his full support and offer encouragement to seek advice from appropriate professional bodies and/or legal advisers.

Avoiding allegations of abuse

As an overarching principle, all members of staff are reminded of the need to conduct themselves as responsible adult' at all times. Whether on campus or when undertaking trips and educational visits appropriate ate boundaries must be observed. The style of communication between staff and pupils may be relaxed and informal at times, but all staff must ensure that such encounters are never at odds with the professionalism, responsibility and discretion expected of any adult working in a boarding environment. Staff are required to complete a code of conduct agreement form (CP1), confirming their agreement to behave within these boundaries.

Every employee has a responsibility to protect pupils at the school from abuse. They should be alert to the definitions and indicators of abuse as well as understanding the school's child protection procedures.

- Members of Staff are not to have current pupils as friends on Facebook or selective social media.
- Staff and pupils should use school email accounts for communication on obviously school-related matters.
- Permission should be requested from the Headmaster (by email or written letter) before paid private tuition is given to pupils.

All members of staff are advised to consider joining professional bodies who could assist in providing legal advice, insurance and professional assistance following any complaint or allegation.

Reporting concerns – guidance for pupils

As detailed on notices distributed across the school, pupils should feel able to discuss their concerns, whether of a general or specific / private nature with any member of staff. This member of staff might be their Housemaster or mistress, their tutor, a nurse or any other member of staff they feel comfortable talking to. They should be assured that their concerns will be treated seriously by whoever they talk to. Their report will be treated on a discreet and 'need to know' basis, and followed up by the School using its established policy.

If any pupil feels the need to express themselves more fully, or feel that they wish to make an immediate and formal complaint, then they may hand a formal written complaint to their Housemaster / Housemistress or to the Second Master. Such a complaint will receive acknowledgement within 48 hours, and if necessary may be referred to the Internal Review Panel, which may ask to hear the pupil's case. The Panel will consist of the Headmaster, the Second Master and one other member of the Senior Management Team. The Headmaster will then decide on the appropriate action to take in response to the complaint made.

No case to answer

If the Headmaster decides that there is no case for further investigation, he will inform the member(s) of staff concerned that there has been a complaint that he believes it to be unfounded and state that no further action is to be taken. In discussion with the Headmaster the member(s) of staff may be accompanied by a friend. Counselling may be appropriate. The Headmaster is responsible for informing the parents of the pupil concerned and deciding on any further action. A report must be written, copied to the member(s) of staff in the allegation, and kept on the pupil's file.

Further investigation required

If the Headmaster decides that further investigation is required - and, in the most serious cases this may not be his decision (i.e. it may be the decision of the local Children's Officer or the police) - then the procedure relating to Child Protection Issues will come into effect the key elements of which are highlighted below.

- The member(s) of staff allegedly involved will be informed in the presence of a witness.
- Advice on legal assistance, teacher organisation representation, counselling where necessary, will be discussed.
- Timed, dated written records will at all times be kept.
- The Chairman of the Board of Directors, the parents of the pupil(s), and the school solicitor will all be informed.
- A decision will be made by the Headmaster on whether the member(s) of staff allegedly involved will be suspended: if so, it will be on full pay. This decision should be regarded as a necessary procedure rather than a judgement on the school's part.
- A decision will be made by the Headmaster on whether it is proper for the member(s) of staff to vacate school accommodation. The Headmaster may feel it necessary to rehouse, at the school's expense, the member(s) of staff allegedly involved. Likewise, the Headmaster may decide that the complainant should remain at home during the investigation.

Early Help

The School recognises that all School staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life.

Curriculum

- The School acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship.
- It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. The curriculum includes teaching regarding PSHE and on-line-safety.
- As appropriate, the curriculum will be used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened.

Mental Health

The School recognises that children and young people may experience mental health difficulties and provides a range of support (medical and non-medical) to pupils who may need help and support.

Drugs

The School recognises that children and young people who are exposed to or involved in substance abuse are a safeguarding concern and may need help and support as outlined in the Drugs Policy.

Missing Child and adults

A pupil going missing from an education setting is a potential indicator of abuse and neglect. Prolonged or repeated absences, or particular patterns of absence (with no satisfactory explanation) are treated by the School as a potential safeguarding issue and action is taken accordingly. The School monitors pupil attendance, contacts home in cases of unauthorised absence and takes further action where appropriate. The School has due regard to the guidance "Children missing education" published by the Department for Education (UK) in September 2016 and Ministry of Education (Kenya, Children's Act 2001).

The School has put in place appropriate safeguarding responses to pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. (The School's Missing Child Policy is available on the staff intranet.) The School is aware of the impact on children of an adult close to them going missing and work in line with government guidance in offering support.

Vulnerable Pupils

- The School acknowledges the additional needs for support and protection of pupils who are vulnerable by virtue of disability, special educational needs (“SEND”), mental health, homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions and pupils who are suspended from the School. The School will not make assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration. The School acknowledges children with SEND can be disproportionately affected by problems such as bullying (without showing any outward signs) and they may have communication barriers and difficulties in overcoming them.
- The School acknowledges that pupils who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or confiding in and/or behaviour towards other pupils.
- The School has a strong commitment to its anti-bullying policy and will consider all coercive acts and inappropriate child on child behaviour and sexual activity within a Child Protection context. This includes bullying (including cyber bullying), gender based violence/sexual harassment & assault and sexting.
- If a pupil discloses that they have witnessed domestic violence and is therefore at risk or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the Designated Safeguarding Lead as a safeguarding issue.

Boarding

- The School acknowledges that particular safeguarding issues can arise in relation to boarding provision, including the risk of peer abuse in a residential setting and the risk of alcohol and substance misuse.
- All boarding pupils are given the details of persons they can contact directly about personal problems or concerns at school (including how they may be contacted). This also includes appropriate agency helplines and outside contact numbers.
- All persons visiting the boarding houses are appropriately supervised.

Outings and Expeditions

All pupils are briefed with regards to safeguarding during trips and expeditions -this includes a reminder of the various safeguarding contacts and where they can be accessed. All pupils have access to the contact numbers of staff should safeguarding issues arise and with the email address safeguarding@peponischool.org for advice or disclosures. All appropriate safeguarding checks are made both at home and abroad according to local law. The Trips Policy can be found on our school intranet.

Notifying parents of injury

In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the School, parents will be notified of this as soon as possible.

Physical Restraint

Any physical restraint used will comply with Department for Education (UK) guidance. In the exceptional circumstances where it becomes necessary for staff physically to restrain a pupil for their own protection or others’ safety, this will be appropriately recorded and reported to the Designated Safeguarding Lead and parents (see Use of Reasonable Force Policy).

Chastisement

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported to the Headmaster or Second Master for investigation.

First Aid and Medical Plans

- Except in cases of emergency, first aid will only be administered by qualified First Aiders.
- All first aid treatment will be recorded and where significant will be shared with parents/carers at the earliest opportunity.
- If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present.

- All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

ICT and on-line Safety (including sexting)

- The School recognises that the use of technology has become a significant component of many safeguarding issues and that an effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and has mechanisms to identify, intervene in and handle incidents that occur. The School has appropriate filters and monitoring systems in place.
- Pupils are taught about on-line safety, including the risk of being exposed to harmful material, the risk of harmful interaction with others and the risk of on-line behaviour that causes or increases the likelihood of harm. They are taught about the dangers of sexting and the risks associated with location sharing. This is covered by our PSHE curriculum.
- All members of staff are required to have read and to follow the School's ICT, Internet and Portable Devices and E-Safety Policies.
- The School is very aware of the growing practice of sexting (including the sharing of sexually explicit photographs and the sending of sexually explicit messages) and the serious harm it can cause. The School has produced guidance for pupils regarding the dangers of sexting, our Sexting Policy. The School has regard to the guidance published by the UK Council for Child Internet Safety and the International Convention on the Rights of the Child.
- Pornography – please refer to Pornography Policy.

Security

Entry to School premises is controlled by doors and gates that are secured physically or by staff supervision or video surveillance. Authorised visitors to the School will be logged into and out of the premises and will be asked to wear their identity badges or be issued with School visitor badges. Unidentified visitors will be challenged by staff or reported to Security.

Low Level Concerns

The School gives guidance to staff about their duty to report low level concerns, including concerns regarding the behaviour of a member of staff towards children.

It is recognised by the School that:

- The method of commencing abuse often includes 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.
- There seems to be a 'slippery slope' of boundary violations towards abuse and that there are many stages on the slippery slope towards the breach of a boundary within a relationship. Sometimes initial infringements are part of a grooming process but at other times they are made innocently and with good intention. However, once boundaries are breached (e.g. inappropriate conversations or other communications, inappropriate physical contact, social contact outside school and favouritism) it then becomes more difficult to restore the relationship to one in which proper boundaries are respected.
- Serious case reviews in the sector repeatedly indicate that staff, parents and pupils were often aware of individual incidents of inappropriate behaviour but that there was a failure to 'join the dots' and take appropriate action. Concerns were not voiced; incidents were viewed in isolation and as too low level to require reporting.

The "low level concerns" guidance given by the School informs staff that:

- Whilst the concern may seem very minor and one-off, the behaviour may form part of a pattern that is putting children at risk or (without intervention) may develop into such a pattern
- The behaviour may have been innocent but the member of staff may need to be given guidance to understand why it was inappropriate and should not happen again.

The Designated Safeguarding Lead conducts a regular review of reported low level concerns to ensure that:

- the concerns are being handled appropriately and proportionately;

- no concerns meet the threshold of mandatory reporting to the Headmaster; and patterns of behaviour are spotted.

Training

All staff undergo child protection training at induction and that training is regularly updated in line with advice received from the NSPCC. All staff receive child protection updates at least annually by email or face-to-face. This training covers: (a) this Safeguarding Policy (including Prevent) and the Low Level Concerns Policy; (b) the School's Code of Conduct; (c) the Staff Code of Conduct, the Whistleblowing Policy, the ICT, Internet and Portable Devices and E-Safety Policies; (d) the identity of the School's Designated Safeguarding Leads and Deputy Leads.

The Designated Safeguarding Leads (and their Deputies) will attend CPAN training when inducted and then refresher training at least every two years and all school leaders read Annex A of Keeping Children Safe in Education (UK).

Designated Safeguarding Leads will be encouraged to attend appropriate training

The H R Department maintains a record of staff child protection training.

Volunteers and Temporary Staff are oriented with regards to the Child Protection and Safeguarding Policies by the Designated Safeguarding Lead.

Records

Brief written notes will be kept of all incidents and child protection or child in need concerns relating to individual pupils. These notes are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared with other agencies as appropriate. The School will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous "secrets".

All Child Protection records are kept securely by the Deputy Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Leads, his Deputies and the Headmaster of the School.

Child Protection records are reviewed regularly so that concerning patterns of behaviour can be spotted and appropriate interventions made.

When pupils leave to go to another school, child protection/safeguarding records will be sent to the receiving school separately and under a confidential cover and a receipt will be obtained (to be adopted September 2018).

The School will require documentary proof as to the identity of pupils presented for admission. We will maintain accurate and up to date records of those with parental responsibility and emergency contacts.

Review of this Policy

The Safeguarding Policy is reviewed each year and updated as necessary. The review process includes consultation with the School's team of Designated Safeguarding Leads and other staff regarding proposed amendments.

Safeguarding is on the agenda for staff meetings each term (to be adopted September 2018). It is the duty of the Second Master to provide all necessary information and to make a report at such meetings. The Directors have formally adopted this policy and review its contents annually or sooner if there are any legislative or regulatory changes.

Document History

1st Draft - May 2014
Housemasters - September 2014
Common Room - October 2014
Child Protection Committee - October 2015
Common Room - September 2017
A du Bois – January 2018
KC, CK, AMD, ADB – January 2018