

**Peponi House
Preparatory School
Nairobi, Kenya**



**Safeguarding and Child
Protection Policy**

Updated to include reference to online distance learning (see Addendum, page 19), April 2020

INTRODUCTION

The Directors and staff at Peponi House take seriously their responsibility to safeguard and promote the welfare of all children in their care. As a British school in Kenya, Peponi House accepts the guidelines given under British Legislation as best practice and seeks to meet the requirements therein, while recognising that the Kenyan context not only restricts the school's ability to do so and legislation in Kenya provides an alternative framework within which to achieve these aims. Peponi House is therefore prepared to work together with other agencies to ensure adequate arrangements are in place within the school to identify, assess and support those children who are suffering harm.

The school recognises that it has the duty to help keep children and young people safe by:

- Providing a safe environment for children and young people to learn in educational settings
- Identifying children and young people who are suffering or likely to suffer significant harm
- Taking appropriate action with the aim of making sure they are kept safe both at home and at school.

Achieving these aims requires systems designed to:

- Prevent unsuitable people from working with children and young people (enhanced DBS checks, mental and physical health verification, qualifications verification, reference checks etc.)
- Promote safe practice and challenge poor and unsafe practice (Health and Safety Committee, visits from outside agencies such as environmental health, rigorous risk assessments)
- Identify instances in which there are grounds for concern about a child's welfare,
- Initiate/take appropriate action to keep children safe (Child Protection Policy). Peponi House School is also an active member for the Kenyan independent schools 'CPAN' network, which keeps practitioners abreast of legislation and best practice in regards to child protection.

At Peponi House, the Directors and staff recognise that they have the duty to ensure that:

- A Child Protection Policy is in place.
- This policy must be made available to parents; it is not posted on the school's website, but available on request.
- Parents are aware that the policy is also available to them in hard copy
- All matters relating to Child Protection are reviewed annually
- The Headmaster takes lead responsibility for dealing with child protection issues
- Members of staff are trained in appropriate procedures relating to child protection
- Staff recruitment follows appropriate procedures and checks are carried out on new staff and volunteers who will work with children, including Enhanced or Standard Disclosure and Barring Service and other checks (e.g. ICPC and CID Certificate of Good Conduct).
- Also anyone who is a UK National or who has worked in the UK must have the International Child Protection Certificate. These can be obtained from the following website. All new staff must apply whilst still in the UK and bring their completed certificate with them on arrival in Kenya. <https://www.acro.police.uk/icpc/>
- The Headmaster informs staff of all procedures relating to Child Protection
- The Estates Manager is responsible for Health and Safety.

This policy has been developed in accordance with the principles established by:

British Legislation

- **“Keeping Children Safe In Education”** published by the Department for Education, **September 2016 (updated 2018). Additional updates have been made in 2019 and 2020 that have been incorporated into this document.**
- The Children Acts of 1989 and 2004 and related guidance.
- Guidance has been sought from IAPS with regard to staff training for the Designated Safeguarding Leads.
- The school follows best practice guidance and all staff annually read Part 1 and Annex A of the KCSIE 2018 document in addition to completing relevant Educare course.

Kenyan Legislation

- The Children’s Act (2001)

Designated Safeguarding Lead

The DSLs who have overall responsibility for child protection practice in school are

- Mrs Melanie Blake (The School Counsellor)
- Mr James Heanley (The Deputy Head Pastoral)

Both of these members of staff have undertaken relevant training for this position.

As part of the ethos of the school we are committed to:

- Maintaining children’s welfare as our paramount concern in line with ‘Keeping Children Safe in Education’.
- Providing an environment in which children feel safe, secure, valued and respected; confident to talk openly and sure of being listened to
- Providing suitable support and guidance so that children have a range of appropriate adults who they feel confident to approach if they are in difficulties
- Using the curriculum to provide opportunities for increasing self-awareness, self-esteem, assertiveness and decision making so that children have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others
- Working with parents to build an understanding of the school’s responsibility to ensure the welfare of all children including the need for referral to other agencies in some situations
- Ensuring all staff receive up to date training and support and are able to recognise the signs and symptoms of abuse and are aware of the school’s procedures and lines of communication through internal inset training.
- Monitoring children who have been identified as “in need” including the need for protection; keeping confidential records which are stored securely and shared appropriately with other professionals
- Supporting staff at Peponi to ensure that they are fully versed in the correct procedure to follow should they have any concerns about a child at Peponi.
- Developing effective and supportive liaison with other agencies, including previous and future schools.

ROLES AND RESPONSIBILITIES

School

The school is responsible for ensuring that all action taken is in the child's best interest. Using many UK and Kenyan guidelines to safeguard Children to the best of the school's ability. The child protection process is now incorporated within a comprehensive policy and procedure for all children in need. The role of the school within this procedure is to contribute to the identification of those who are at risk of suffering significant harm. The school may also have a role in the provision of services to outside agencies.

All Directors and staff, including peripatetic, domestic/ground staff in school have a role to play in relation to:

- Protecting children from abuse
- Promoting the welfare of children
- Preventing children from being harmed

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

The Designated Safeguarding Leads or DSLs are responsible for:

Co-ordinating child protection action within school

- Liaising with other agencies
- Ensuring that locally established procedures are followed including reporting and referral processes
- Acting as a consultant for staff to discuss concerns
- Making referrals as necessary
- Maintaining a confidential recording system in liaison with the school Nurse
- Representing or ensuring the school is appropriately represented at inter-agency meetings in particular Child Protection Conferences (DSLs will attend CPAN events once a term).
- Managing and monitoring the school's part in child care
- Organising training for all school staff
- Liaising with other professionals
- Transferring records when a child changes school
- Informing the designated Director of any allegations of child abuse.

Parents

We will always undertake to share our concerns with and support parents/carers but the school is required to take into account the safety of the pupil. Professional advice would be sought prior to contacting parents should the need arise.

GENERAL STRATEGIES

At Peponi House there are a number of strategies to address safeguarding issues. These include:

- Health and Safety procedures
- Risk Assessments
- Safe recruitment procedures including the need for DBS checks – see Safer Recruitment Policy
- Care / Educational Plans
- Strong Home/School Links
- School Council
- Clubs
- Complaints Procedures
- Anti-Bullying Policy
- Good role modelling from staff
- All children are encouraged to take on responsibilities and roles to ensure the safe keeping of themselves and each other.
- An online teaching and learning policy in case the school is closed and learning has to take place through online platforms.

PROCEDURES

The school's Safeguarding and Child Protection Policy, recording forms and body maps are in the DHP's office and available on request. They are also available from the school nurse, and soft copies are in the Administration folder on the school network.

RECOGNITION AND CATEGORIES OF ABUSE

All staff in school should be aware of the definitions and signs and symptoms of abuse.

There are four categories of abuse. These are:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

The signs and symptoms of abuse are listed in the leaflet "Guidelines for School staff" and is stored on the shared staff network for referral. A copy of the DOH guidelines "What to do if You're Worried A Child Is Being Abused" is also available to staff.

RESPONDING TO CONCERNS

Concerns for a child may come to the attention of staff in a variety of ways, for example, through observation of behaviour or injuries or disclosure. Any member of staff who has a concern for a child or young person, however insignificant this might appear to be should complete the relevant form and discuss this with the DSL as soon as is practically possible. More serious concerns must be reported immediately to ensure that any intervention necessary to protect the child is accessed as early as possible. Action will then be taken by the DSL and notes taken.

If a child makes a disclosure of abuse to a member of staff they should:

- Allow the child or young person to make the disclosure at their own pace and in their own way
- Avoid interrupting except to clarify what the child is saying (attentive listening/reflective feedback)
- Not ask leading questions or probe for information that the child or young person does not volunteer
- Reassure the child or young person that they have been heard and explain what you will do next and to whom you will talk
- Record the conversation as soon as possible – All conversation notes will be taken and kept securely by MB in her office.
- Inform the DSL

RECORD KEEPING

In the event of any form of allegation or disclosure having been made, or in the event of a member of staff finding any cause for concern, a written record must be kept and recorded **within 24 hours**, with the record being passed to and stored by the DSL.

Staff can play a vital role in helping children in need or at risk by effective monitoring and record keeping. Any incident or behavioural change in a child that gives cause for concern should be recorded. It is important that records are factual and reflect the words used by the child or young person. Opinion should not be given unless there is some form of evidence base which can also be quoted. Records must be signed and dated with timings if appropriate. It is important to remember that any issues are confidential and staff should know only on a 'need to know' basis.

Information to be recorded, on the Record of Concern and Body Map if necessary

- Child's name and date of birth
- Child in normal context, e.g. behaviour, attitude, (has there been an extreme change)
- The incident(s) which gives rise for concern with date(s) and times(s)
- A verbatim record of what the child or young person has said.
- If recording bruising/injuries indicate position, colour, size, shape and time on a body map.
- Action taken

The details above are vital to the information gathering process and do not constitute an investigation. Written information should be passed to the DSL. The Headmaster should always be kept informed of any significant issues.

Storage of records

The DSL / MB will ensure that records relating to concerns for the welfare or safety of children are kept separate from other school files and are stored securely. Information will be shared on a strictly need to know basis and in line with child protection policy guidance.

INVOLVEMENT OF ANY EXTERNAL AGENCY

It is the responsibility of the DSLs to decide when to involve any external agency. To help with this decision the DSL may choose to consult, within 24 hours of a disclosure or suspicion of abuse with the District Children's Officer (DCO) or his/her assistant the Children's Officer (CO). Advice may also be sought from other relevant external agencies or individuals. Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these. Some concerns may need to be monitored over a period of time before a decision to involve an external agency. In all but the most exceptional cases parents/carers will be made aware of any concerns felt for a child.

Involvement of an external agency will be recorded using the school's referral form. In situations where there are felt to be urgent or grave concerns a telephone referral may be made prior to the form being completed and sent to the DSL. If a child's situation is referred to an external agency, the DSL will ensure that other relevant members of staff are informed of this. If after consultation with the DSL, a member of staff feels that appropriate action is not being taken in respect of their concerns for a child they should refer directly to the Headmaster.

External agencies include:

- **Dr S. Nesbit**
- **The Multi-Disciplinary Team (MDT) and the Child Protection and Advocacy Network (CPAN).** A full list of contacts is with both MJB (counsellor) and DHP
- **CRADLE**, another support network linking Police and other government bodies should the need arise. (www.thecradle.or.ke)
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A CHILD SUBJECT TO A PROTECTION PLAN

The DSL will inform staff who has direct pastoral responsibility for a child who is the subject of a child protection plan. Such children must be monitored very carefully and the smallest concern should be recorded on an incident sheet and passed immediately to the DSL or assistant DSL in the DSLs absence.

Staff training

All teaching staff at Peponi House, as well as key members of the administrative staff, are required to complete online training supplied by IAPS iLearning (staff also hold relevant Educare course certificates, which were completed in the 2018-19 academic year). The core courses that are to be completed are:

- Child Protection for International Schools
- Online Safety for International Schools
- Preventing Bullying for International Schools
- Safeguarding Young People
- Safer Recruitment for International Schools
- The Prevent Duty

As part of the new staff induction at PHPS all staff will have a meeting with the DSL to:

- Discuss procedures that are in place
- Be given an overview of different types of abuse and symptoms that could possibly be encountered.
- Be made aware that there is a file in the Staff Admin section on the school network that gives a detailed list of signs and symptoms of abuse.
- They are aware that this file is attached to the staff handbook.
- They are aware of where the school councillors office is, who she is and the relevant paperwork is kept should it ever be required.

There will also be an annual or bi annual update on CP by the DSL for staff in the September term. This will be created by working with P2 to create a programme that flows between both schools.

All staff will receive an annual update by the DSL / DHP covering the same training as the teaching staff in an appropriate format.

PROCEDURE FOR MANAGING ALLEGATIONS AGAINST STAFF

See also the Whistleblowing Policy and Procedure

If a child or a parent volunteers to a member of staff information about abuse by another member of staff, the person receiving the information must immediately write down the information given and inform the Designated Child Protection Officer. Teachers are particularly vulnerable to accusations of abuse but even though such allegations may be false, malicious or misplaced, reporting must be as immediate as is practical and the informant assured of that. Such information will be extremely sensitive as abuse in these circumstances is particularly serious; however, unfounded allegations can be traumatic for the teacher concerned and can inflict long term damage on a person's health and career. In the event of any such allegations DCSF best practice will be followed.

The Designated Safeguard Lead (DSL) will consider initially whether there is sufficient substance in an allegation to warrant investigation. The DSL will consult with relevant professional bodies or individuals and the Designated Directors will be informed. If the allegation refers to the DSL then the Directors will be informed to progress the investigation. In cases of serious harm the Police will also be informed immediately.

Staff should be aware that they are at risk of accusation or abuse. It is advisable to avoid physical contact with children. All sports coaches will be given clear guidelines on acceptable conduct whilst undertaking their duties by the Director of Sport. All one to one meetings with children should be conducted in school office areas or classrooms where the doors remain open with other staff nearby as a safeguard to all. Adequate regard for transparency and lack of secrecy should be had. Children should not normally be transported by car unless in a group. School minibus or hired transportation is advised wherever possible.

Staff should not normally communicate electronically with children other than by use of the school email addresses and system on matters of school business only. Where a private email address is used it is advisable that parents are made aware of the communications and even copied in. Each communication may be screened by the ICT Department under the Acceptable Use Policy. Staff should not normally hold child mobile numbers on their personal telephones nor use SMS text to communicate with children from their private phones. However, on school trips, if personal mobiles are allowed for children, then a store of children's phone numbers may be kept on a school phone but should be removed immediately thereafter.

All staff may make a public interest disclosure in the interests of child safety at any point and may approach any one of the DSL, the Nurse or the Directors with any concerns they may have regarding Child Protection. **Any such disclosure, often known as whistle-blowing, will not entail recrimination on behalf of the staff member making such a disclosure.**

Further information regarding the procedure for managing situations involving members of staff or the DSL can be found in the Whistleblowing Policy. Copies of this document are held by the DSL and are on the school's internal network.

All staff need to be aware that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk When in doubt - consult. (For specific guidance on how to respond to allegations against staff, please refer to the Whistleblowing Policy).

The school will report to the relevant authorities any person (whether employed, contracted, a volunteer, or pupil) whose services are no longer used because he/she is considered unsuitable to work with children. This responsibility will be honoured by Peponi House where there is any reason to believe that such a person may seek employment in the UK.

PEER-ON-PEER ABUSE: MANAGING ALLEGATIONS AGAINST OTHER CHILDREN

At Peponi House we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children. We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy.

DfE guidance, **Keeping Children Safe in Education (2016, updated 2018)** says that 'All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse'. All members of the school community must be aware that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up".

The DfE guidance also states the importance of minimising the risks of peer-on-peer abuse. In most instances, the conduct of children towards each other will be covered by the school's behaviour policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older children and their behaviour towards younger children or those who are vulnerable.

The safeguarding implications of sexual activity between young people

The intervention of child protection agencies in situations involving sexual activity between children can require difficult professional judgements.

It may also be difficult to be sure that what has or has been alleged to have taken place definitely does have a sexual component.

As usual, important decisions should be made on a case by case basis, on the basis of an assessment of the children's best interests.

Referral under safeguarding arrangements may be necessary, guided by an assessment of the extent to which a child is suffering, or is likely to suffer, significant harm.

Key specific considerations will include:

- The age, maturity and understanding of the children;
- Any disability or special needs of the children;
- Their social and family circumstance;
- Any evidence in the behaviour or presentation of the children that might suggest they have been harmed;
- Any evidence of pressure to engage in sexual activity;
- Any indication of sexual exploitation;
- There are also contextual factors. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power. A sexual predator may sometimes be a woman or girl and the victim a boy

Prevention

As a school we will minimise the risk of allegations against other children by:-

- Providing a developmentally appropriate PSHEE syllabus which develops children's understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any children to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe those children identified as being at risk
- Developing robust risk assessments and providing targeted work for children identified as being a potential risk to other children.

Allegations against other children which are safeguarding issues

Occasionally, allegations may be made against children by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that, to be considered a safeguarding allegation against a child, some of the following features will be found. If the allegation:

- Is made against an older child and refers to their behaviour towards a younger child or a more vulnerable child
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other children in the school
- Indicates that other children may have been affected by this child
- Indicates that young people outside the school may be affected by this child

Then the allegation should be treated as a safeguarding issue.

Examples of safeguarding issues against a child could include:

Physical Abuse

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

Emotional Abuse

- Blackmail or extortion
- Threats and intimidation

Sexual Abuse

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting

Sexual Exploitation

- Encouraging other children to engage in inappropriate sexual behaviour (For example -having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
- Photographing or videoing other children performing indecent acts

Procedure

When an allegation is made by a child against another child, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the designated safeguarding lead (DSL) should be informed.

- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances
- The DSL should contact the appropriate agencies (MDT, CPAN, CRADLE etc.) to discuss the case
- The DSL will follow through the outcomes of the discussion and take further action where appropriate
- Parents, of both the child being complained about and the alleged victim, should be informed
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children's files
- It may be appropriate to exclude the child being complained about for a period of time according to the school's behaviour policy and procedures
- A thorough school investigation should take place into the matter using the school's usual disciplinary procedures, and keeping the designated Director informed
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a supervision plan
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned

CODE OF PRACTICE FOR MEMBERS OF STAFF

All school staff should take care not to place themselves in a vulnerable position with relation to child protection. Never leave yourself open to allegation, being alone in a room with a child and the door locked.

Always keep the door open and inform another member of staff that you are with that child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Physical intervention should only be used when the child is endangering themselves or others and such events should be recorded and signed by a witness. Staff should be aware of the school's own Behaviour Management Policy and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.

If a member of staff has any suspicions of any form of abuse it is their responsibility to report it immediately using the Record of Concern form to the DSL. This form is in the staff handbook and on the school Admin network. This form is a way of tracking and monitoring and concerns that a member of staff has. It is strictly private and confidential.

All school staff should work towards providing an environment and atmosphere for children to enable them to feel safe to talk. However, staff should never promise a child to keep certain information confidential. It must be explained that staff have certain duties to help keep that child safe, which may involve informing others.

Staff should not normally communicate electronically with children other than by use of the school email addresses and system on matters of school business only. Where a private email address is used it is advisable that parents are made aware of the communications and even copied in. Each communication may be screened by the ICT Department under the Acceptable Use Policy. Staff should not normally hold child mobile numbers on their personal telephones nor use SMS text to communicate with children from their private phones. However, on school trips, if personal mobiles are allowed for children, then a store of children's phone numbers may be kept on a school phone but should be removed immediately thereafter. Social media must not be used by staff for contact with children at PHPS, if this occurs the school will not support you. (See also Social Media Policy).

SUPERVISION AND SUPPORT

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL. All newly qualified teachers and classroom assistants must discuss concerns including the area of child protection with the DSL should they have any concerns. The DSL can also put staff and parents in touch with outside agencies for professional support if they so wish.

TRAINING OPPORTUNITIES

The DSL is responsible for ensuring staff including him/ herself receive training in the area of safeguarding and child protection. For Designated Staff this will take place regularly and at intervals no greater than 3 years for a DSL and 5 years for other members of staff. All staff will undertake Educare/IAPS online training.

MONITORING AND REVIEW

All school staff know that there is a paper copy of this policy in the staff room and that is on the school network in the Admin folder. The policy forms part of the school development plan and will be reviewed annually by the Designated Director. The review will take the form of a visit to the school to meet with the DSL, the scrutiny of any documentation relating to Child Protection and discussions with the staff. Should any deficiencies or weaknesses in our policy be highlighted at any time, an immediate review will take place by the DSL and the Designated Director and the revised procedure will be issued with immediate effect. All members of staff have access to this policy and must sign to the effect that they have read and understood its content.

IMPORTANT DEFINITIONS OF CONCEPTS INVOLVED

Cruelty to children, or child abuse, is behaviour that causes significant harm to a child. It also includes knowingly failing to prevent serious harm to a child. All forms of cruelty are damaging BUT it can be harder to recover from the emotional impact than from the physical effects. Only a small minority of cases of child abuse involves a total stranger. It is far more likely to be carried out by someone known to the child or family – even someone close who you'd expect to trust, such as a parent, another relative or a family friend.

Abuse happens in all walks of life, regardless of colour, creed or class. Nevertheless, particular groups of children can be at an increased risk, especially those growing up in a violent household or in a home where there is parental misuse of drugs or alcohol.

FOUR TYPES OF CRUELTY

Physical abuse: including hurting or injuring a child, inflicting pain, poisoning, drowning, or smothering.

Sexual abuse: including direct or indirect sexual exploitation or corruption of children by involving them in inappropriate sexual activities.

Emotional abuse: repeatedly rejecting children, humiliating them or denying their worth and rights as human beings.

Neglect: the persistent lack of appropriate care of children, including love, stimulation, safety, nourishment, warmth, education, and medical attention.

A child who is being abused may experience more than one type of cruelty.

Discrimination, harassment, and bullying are also abusive and can harm a child, both physically and emotionally.

PHYSICAL ABUSE

It is important that a professional who sees an injury on a child takes careful note of how the injury allegedly happened, including the informant, the date, time, place, sequence of events, nature of injury etc. The assessment of the plausibility of the explanation is a medical judgement - other professionals should not make this decision

Although children do have a variety of accidents, the most common types of injury they sustain are usually different from the injuries caused by abuse.

The following situations, in cases of physical injury, should cause concern about the possibility of physical abuse:

- no explanation
- inappropriate explanation, e.g. description of a minor accident in relation to a major injury
- different explanations given to different enquirers
- parents touchy or defensive, compared with genuine accidents when parents are usually distressed and blame themselves
- delay in seeking treatment
- child states that a particular adult hurt him or one parent accuses another

- The following injuries should cause concern about the possibility of physical abuse, because they are at classic sites or fit recognizable patterns (e.g.: human hand marks, human bite marks).

Sexual abuse: including Child sexual exploitation & Genital Mutilation.

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM):

An additional FGM policy provides information about female genital mutilation (FGM) and what action should be taken to safeguard girls who may be at risk of being, or have already been, harmed. FGM is extremely traumatic, can be fatal, and has significant short and long term medical and psychological implications. It is illegal in Kenya, and therefore is a child protection issue.

FGM has been a criminal offence in Kenya since the Prohibition of Female Genital Mutilation Act 2011 was passed.

The 2011 Act not only criminalized FGM for underage girls but for everyone and also banned the stigmatization of women who had not undergone FGM. The 2011 Act extended the powers of previous legislation, providing for the prosecution of those who perform FGM and anyone who aids such a person or who knowingly fails to report knowledge of such acts or pending acts in Kenya or abroad.

The school has a FGM working group in which there are representatives from a number of different tribal groups within Kenya, to offer support and advice. The group is led by the School Counsellor (Mrs Melanie Blake, Deputy Safeguarding Lead). The group meets once per term.

If a member of staff needs advice or has any cause for concern about a child at risk, they should seek help from the working group through the School Counsellor.

As a school we recognise that whilst there is no intent to harm a girl through FGM, this illegal practice directly causes serious short and long term medical and psychological complications. Consequently it is a physically abusive act.

It is our aim to prevent the practice of FGM in a way that is culturally sensitive and with the fullest consultations with all members of our school community.

All staff should be alert to the possibility of FGM. This policy represents a preventative strategy that focuses upon education, as well as the protection of girls at risk of significant harm. The following principles should be adhered to:

- The safety and welfare of the girl is paramount;
- All agencies and staff, including volunteers, will act in the interest of the rights of the girl, as stated in the UN Convention on the Rights of the Child (1989);
- All decisions or plans for the girl should be based on thorough assessments which are sensitive to the issues of age, race, culture, gender, religion. Stigmatisation of the girl or their specific community should be avoided;

Preventing radicalization:

As a staff we have completed the EduCare training on this aspect of child protection. Please also see our separate Prevent Policy.

NEGLECT AND EMOTIONAL ABUSE

Neglect and emotional abuse occur when a child's needs for security, love and praise and recognition are unmet. Basic needs such as food, drink and warmth may not even be provided by primary carers.

Slowing of growth without a medical cause may be indicative of emotional abuse and can occur even when a child is not deprived of food. However the weight can be appropriate for height but disproportionate for age.

There is usually a dramatic increase in growth following the removal of an abused child from home.

INJURIES CHARACTERISTIC OF ABUSE

- Bruising and skin marks
- Black eyes - these cannot be caused by a fall on a flat surface – two black eyes are particularly suspect, especially
- if the lids are swollen and tender or there is no bruise to the nose or forehead
- Bruised ears - sometimes with bleeding
- Bruises of upper lip - torn frenulum of upper lip and injuries under the tongue
- Bruising around mouth of child - (may have finger bruises: three or four on one side and one on the other)
- Flat hand marks - particularly on cheeks, buttocks or backs of thighs
- Bruises - on scalp and “bald patches”
- Finger bruises - on shoulders, upper arms or on the trunks or legs of babies
- Linear marks or bruises - often seen on buttocks or backs of thighs
- Bruises or weals curving around the body - Sometimes buckle or loop marks noted
- Bizarre-shaped bruises with sharp borders - e.g. from hair brush, comb, slipper
- Bruises on abdomen - unlikely to be accidental
- Ligature and choke marks - red mark or bruising around wrist, ankles or neck (the latter may be due to sudden
- pulls on tee shirt)
- Bite marks - two crescent shaped marks / bruises. If more than three centimetres apart they may be caused by an
- adult or older child
- Human nail marks - these shows piled up skin at the end of the marks and are unlike abrasion from falls on
- rough surfaces; they may just be linear bruises
- Approximate age of bruises from their appearance:

• Appearance	Age
• Swollen, tender	0-2 days
• Red, blue, purple	0-5 days
• Green	5-7 days
• Yellow	7-10 days
• Brown	10-14 days or longer
• Clear	2-4 weeks
- Burns
- Scalds - glove or stocking scalds to hands and/or feet caused by dunking in water
- Scalded buttocks - children cannot scald their buttocks accidentally without also scalding their feet and legs.
- Splash marks - look at direction of splash to see if it is compatible with story or might indicate hot liquid being
- Objects thrown at child.

- Cigarette burns - small circular burns most typically on the back of hands or forearms, often seen in clusters and of different ages.
- Contact burns - child held against heaters, iron, and cookers. Well demarcated burns following contours of hot objects.
- Bone and joint injuries
- These can be caused by direct blows, twists (from swinging a child round by one limb).

Additional areas of child protection as stated in the KCSIE 2019 updates include:

- Upskirting:

“Upskirting” typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Although this harassment is known as “upskirting”, people of any gender can be victims. Photos can be taken under any item of clothing including shorts and trousers. Content related to this is added to the sub-section of KCSIE on peer-on-peer abuse, but it is worth noting that staff are at risk of harassment in this way as well as pupils.

- Serious violence:

While violent crime is not a new issue, figures have shown that prevalence of crimes involving weapons have increased, and there is increased concern that children are getting involved in criminal activity. Schools have a duty and a responsibility to protect their pupils and students. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime.

PASTORAL CARE & CHILD PROTECTION

From “Keeping Children Safe in Education” (2016, updated 2018):

Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals 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 child.

Notwithstanding the specific responsibilities laid out in the following section, it cannot be emphasised strongly enough that all members of staff at all times have a duty of care for the children in the school and to ignore the needs of a child because ‘I am not on duty’ is not an acceptable approach to be taken by any member of staff in Peponi House.

Junior Department:

Form Teachers are responsible for the care of children in their own classes and for reporting immediately any concerns to the Year Group Co-ordinator, the school counsellor, a DSL or a member of the Senior Leadership Team, usually the Deputy Head Pastoral.

Senior Department:

It is the responsibility of the class tutor to monitor the social knit and welfare of the class as a whole. On an individual level it is the class tutor who is primarily responsible for pastoral care.

Each full-time member of senior department staff is given a shared responsibility for the welfare of a form, either as a class tutor or as an administrative tutor. In addition to monitoring the child’s academic progress (*refer to General Academic Policies*), the tutor is responsible for dealing with any problems or worries

that the child may be experiencing, and for discussing any such problems with the child - and with the parents, if appropriate. Tutors are expected to get to know their tutees in an informal way and to encourage communication and confidence. It is suggested that one of the two tutor meetings per week should be devoted to discussion, e.g. subjects such as friendship problems and bullying. The children's pastoral needs are also addressed in the classroom at weekly PSHE lessons, where a theme from Assembly may be followed through.

Parents are welcome to contact their child's tutor with any concerns or to refer the matter directly to the Headmaster.

Both Departments:

Pastoral care is also addressed in the classroom by the concept of "Circle Time", through which children are encouraged to talk about and discuss personal matters of relevance to the class as a whole; these sessions are generally led by the class teacher.

Parents are encouraged to contact their child's teacher/tutor if they have any social concerns. These should always be reported to the Head of Junior Department or Headmaster by the teacher/tutor, as should any significant concerns that are addressed to a teacher/tutor by a child.

Children and parents are always welcome to go straight to the Headmaster with their worries. The Headmaster is personally responsible for investigating and endeavouring to solve any significant or repeated problems relating to children's safety, security of welfare.

The Headmaster should be contacted immediately by any member of staff aware of, or who has suspicion of, any of the following:

- Any form of bullying; (see also Behaviour Policy and Anti-Bullying Policy)
- Any form of accident involving a child (see also Staff Handbook)
- The absence of a child from the school grounds;
- The presence of an unfamiliar or suspicious person in the school grounds;
- Any form of child abuse.

In the absence of the Headmaster, members of the staff should refer to the Deputy Head Pastoral, the Deputy Head Academic or Head of the Junior Department as appropriate. Please note that informing a member of the SLT about an incident does not relieve a member of staff from their responsibility to take action on any of the above occasions.

ON LINE SAFETY (E-SAFETY)

The School recognises that Information Technology, (I.T.) and the Internet are excellent tools for learning, communication and collaboration. These are accessible within the school for enhancing the curriculum, to challenge pupils, and to support creativity and independence. Using IT to interact socially and share ideas can benefit everyone in the School community. However, it is important that the use of IT and the internet is understood and that it is the responsibility of pupils, staff and parents, to use it appropriately and practise good e-safety. It is important that all members of the school community are aware of the dangers of using the internet and how they should conduct themselves online

There are three main areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

The school will do all that it reasonably can to limit children's exposure to the above risks. Filters and monitoring systems are in place, using Cyberoam network security, as well as the protection provided in collaboration with the school's ISP.

There is a school-wide approach to e-Safety, with most of the teaching and learning taking place in computing lessons. Regular assemblies on the topic are followed up by PSHE lessons immediately afterwards.

Children are not allowed to bring mobile phones into school. Some children may from time to time be asked to bring a tablet or laptop into school. In this instance, the device is kept in the DHP's office until such time as it is required. The device is returned immediately after the lesson for which it was requested.

Cyberbullying

Cyberbullying, as with any other form of bullying, is taken very seriously by the school. Information about specific strategies to prevent and tackle bullying are set out in the school's Behaviour Policy. The anonymity that can come with using the internet can sometimes make people feel safe to say and do hurtful things that they otherwise would not do in person. It is made very clear to all members of the school community what is expected of them in terms of respecting their peers, members of the public and staff, and any intentional breach of this will result in disciplinary action. Any incidents of cyberbullying will be dealt with in accordance with the School's Behaviour Policy and, where appropriate, the School's Safeguarding and Child Protection Policy.

ADDENDUM – APRIL 2020

Child protection measures for online learning

Due to the forced closure of schools in March 2020, the school has made provision for use of online platforms to continue the teaching and learning process. The policy 'Teaching and Learning Online' was created in March 2020 to cover the procedures that the school will take to deliver this online learning as safely and effectively as possible. All staff have read this policy and it has been shared with parents through our Firefly parent portal.

The school recognises that online learning has its own specific issues related to child protection and safeguarding. According to the U.K. Government (from which the school takes its guidance as an IAPS and BSO regulated school) updated online safety guidance (UK Government, 2020), the issues identified as specific to online learning include:

- Providing a safe and secure online teaching and learning environment, where teachers, children and parents are all informed regarding risks of online environments and information is shared as to how best to minimise that risk.
- What staff and volunteers should do if they have any concerns about a child
- The continued importance of all staff and volunteers acting and acting immediately on any safeguarding concerns
- Designated Safeguarding leaders (DSLs) and school counsellor arrangements – contact and availability when not in school
- The continued importance for school and college staff to work with and support children’s social workers and families
- Peer on peer abuse - given the very different circumstances schools and colleges are operating in a revised process may be required for managing any report of such abuse and supporting victims (the principles as set out in part 5 of KCSIE (2018) should continue to inform any revised approach)
- What staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE will continue to support how a school or college responds to any such concerns)
- Any arrangements to support children the school or college are concerned about who do not meet the ‘vulnerable’ definition
- What arrangements are in place to keep children not physically attending the school or college safe, especially online and how concerns about these children should be progressed

From the same UK government guidance, the provision of safeguarding from the school needs to maintain the same principles as would be applied during ‘normal’ school operation:

- With regard to safeguarding, the best interests of children must always continue to come first
- If anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately
- A DSL or deputy should be available (if not on site, through contact procedures made available to all relevant persons)
- It is essential that unsuitable people are not allowed to enter the children’s workforce and/or gain access to children
- Children should continue to be protected when they are online

Peponi House School has put in place the following measures to ensure that the needs of the children are prioritised during the online teaching and learning process:

- The school has created a ‘teaching and learning online’ policy which outlines the expectations of staff, parents and children in using the online platforms (specifically Zoom, Seesaw and Microsoft Teams) safely and responsibly.
- The registration system has been adapted so that attendance is formally recorded for all form time sessions and online classes taking place in the school day. Absences are reported in the same way as a normal school day, and followed up with parents. Parents have been given clear instructions to inform form tutors for absences, as per our normal registration policy.
In Juniors, form times take place at 8.00 -8.30 a.m. Monday to Friday.
In Seniors, form times take place at 7.45-8.00 a.m. Monday, Wednesday, Thursday and Friday, and at 8.00-9.00 a.m. on Tuesdays.

Pastoral support has been built into form times, so that all staff are continuing to discuss wellbeing and mental health as part of the online education programme. Pupil surveys are inbuilt into this. Staff are aware of the reporting procedures if they have any concerns about a child.

- Staff have been trained to use these platforms in a secure way. Examples of the safeguards in place include:
 - Personalised school logins for each child to the online learning platforms.
 - Access to platforms can only be gained through specific school e-mail addresses
 - Video meetings are password protected and entry to each video meeting is controlled by a member of staff.
 - Arrangements have been made for any 1to1 meeting between a teacher and child to have a responsible, named, adult present in the room with the child, and parental consent for the meeting to take place.
 - 4 designated members of staff are on hand to provide real time IT support in all virtual classrooms. They are able to monitor activity and maintain IT security measures on the school network during the online teaching and learning sessions.
 - A clear reporting process if a member of staff, an adult or child has any concerns related to child protection online. The process mirrors that outlined previously in the child protection policy. The school counsellor, Melanie Blake, has shared her contact details with all parents and is available through the day and night to receive communication. As stated in the ‘teaching and learning online’ policy, the DHP and School Counsellor are the contact points for any concerns or queries related to child protection online.
- Vulnerable children are a priority – the school counsellor and DHP are in constant communication with staff to identify children and families whose mental or physical health may be a cause for concern. Recorded procedures are in place to assess needs and provide support, as per our normal child protection policy.
- The school has shared information with parents regarding online safety, which is posted on the ‘dashboard’ area of Firefly. The school has been providing regular updates and parents’ information sessions on online safety through the school year.
- The DSLs are continuing to receive guidance and support through the IAPS network, CPAN virtual meetings, and IAPS iLearning courses. Updates are shared with relevant bodies through email and through the school’s online communication channels. Staff training will be provided where in line with best practice.

For further information, please see these websites:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

All members of staff should be aware of the following:

Lock Down Alarm

During lessons the horn alarms should be used to alert other members of staff to a perceived danger and the school should go into “lock down” mode until clearance is given by a member of the SLT. Lock down mode means children must remain in classrooms or be brought to one if outside. Details of the procedure are displayed in every classroom around the school.

School Councils

To give the children a voice within the school community and to develop our awareness and understanding of our place in the World, the school has a School Council, Food Council and Environment Council. Children volunteer or are voted into these roles and they change periodically to give as many children as possible the chance to make a difference.

Legal aspects of a child in Kenya

- In every district in Kenya, there is a District Children's Officer (DCO) and a Children's Officer (CO). The latter acts as an assistant to the DCO.
- Any child's grievance is reported to the DCO who reports directly to the police.
- The police give a P3 form to enable the child to be taken to a doctor.
- In Nairobi, children are mostly referred to Nairobi Women's Hospital. At the district level, to district hospitals/Government hospitals.
- Any prosecution would follow depending on the doctor's report. The DCO will always follow up a Court case and ultimately give advice on the child's placement.
- Where a child needs immediate withdrawal from a risk environment; the DCO will look for a place of safety either in
 - (a) CCI (Charitable Children's Institutions) or
 - (b) Statutory Institutions (Government Facilities) which include
 - (1) Reception Centers (where all children committed through court are received before sent to other institutions)
 - (2) Children's Homes (give the children care and protection)
 - (3) Remand Homes (for convicted or juvenile cases)
 - (4) Rehabilitation Schools (for juvenile cases)

NB

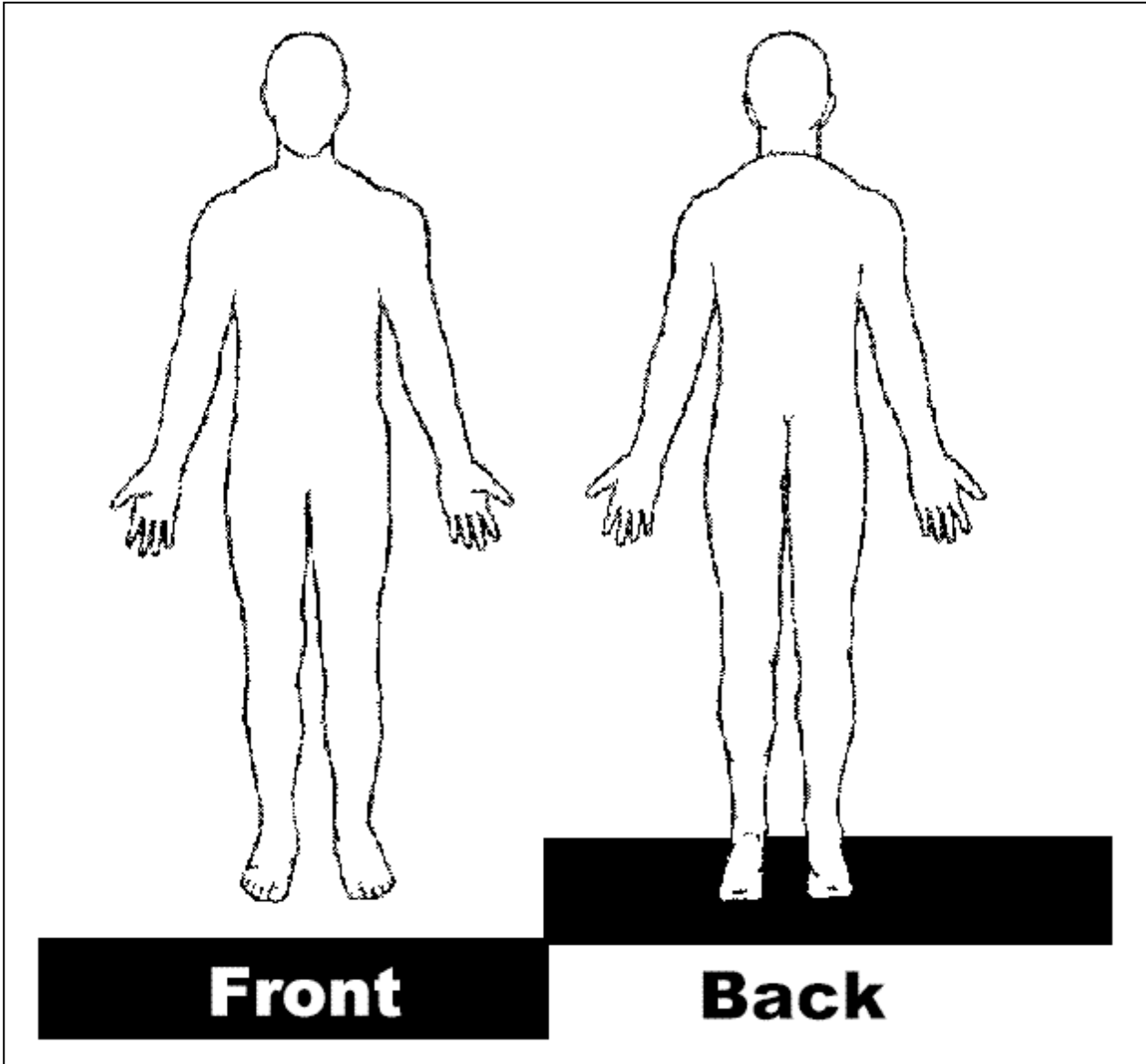
- (1) Except for the children's homes, the rest cater for children in conflict with the law.
- (2) Academic qualification of the DCOs and COs is either,
First degree in Sociology/psychology
Community Development Degree
- (3) The Kenyan constitution has outlined channels to meet the children's grievances under the children's Act 2001. The act is available at the Government press and it can be purchased.
- (4) All the above are under the Ministry of Gender, Children and Social Development.

In Consultation with the British High Commission

In the event of a foreign national child being the subject of withdrawal from a risk environment by Kenyan Authorities, the relevant embassy or high commission **should** be informed of the action through the Ministry of Foreign Affairs (MFA). There is no record of this ever having to be implemented in a British context. However, the following should be noted

- There is no obligation on the MFA to involve either the school or the relevant embassy in any decision over what would constitute a suitable placement for the child(ren)
- There is no obligation on the MFA to inform the school of such an action
- In the case of the British High Commission (and by extension we, as a school, have assumed other embassies and High Commissions), on becoming aware of such an intervention by Kenyan authorities, it would seek to become involved by offering advice from Social Services in the UK.

Peponi House Prep School – Body Map



Recorded by:

Witnessed by:

Dated:

Child Protection: Record of Concern

Record of Concern

Name of child:

Date:

Time:

Duration:

You must record accurately here any questions that you asked and the answers that were given by the child. When recording a child's words, you **MUST** use the actual words used by the child. If in doubt, acknowledge your words might not be exact.

If there is any evidence of physical injury, this should be indicated separately on a body map.

Notes:

Plan:

Print and Sign Name:

Position School: