



St Andrew's School, Turi

Safeguarding and Child Protection Policy

1. Policy

Policy statement

The School recognises its statutory and moral responsibilities to safeguard and protect the welfare of all the students in its care. We endeavor to provide a safe, supportive and positive environment in which students can discover their God-given identity and flourish.

Scope

This policy and any associated procedures apply to both the Senior and Preparatory Schools.

Definition

Safeguarding and promoting the welfare of children is defined for statutory purposes as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes both inside and outside school (contextual safeguarding).

Terminology

In this policy, '**Board**' refers to the Board of Governors; '**School**' refers to both the Senior and Preparatory Schools either separately or jointly depending on the context; '**Head**' refers to both the Head of the Senior School and the Head of the Preparatory School; '**DSL**' refers to the Designated Safeguarding Lead (there is a DSL and a deputy in each of the two Schools); '**Staff**' refers to all those working for or on behalf of the School (including staff working on behalf of third party contractors), full or part-time, permanent or temporary, in either paid or voluntary capacities, and governors; and '**Parents**' includes one or both parents, and legal or education guardians.

Regulatory framework

This policy takes account of all relevant legislation. The following documentation has been consulted in the compilation of this policy:

Kenyan law

The Constitution of Kenya 2010 Children's Act (2001)

The Penal Code

The Basic Education Act (2013)

UK law

Keeping Children Safe in Education (September 2018)

What to do if you're worried a child is being abused (March 2015)

Working Together to Safeguard Children (March 2015)

Prevent Duty Guidance: for England and Wales (July 2015)

In particular, it is based on the United Nations Convention on the Rights of the Child (CRC) 1989 and the African Charter on the Rights and Welfare of the Child (ACRWC) 1999.

This policy also acknowledges 'Standards for British Schools Overseas' (September 2017) and the accompanying cited legislation and guidance.

Review

This policy will be subject to annual review by the Board unless an incident, guidance or new legislation requires an earlier date of review.

2. Roles and responsibilities

The Board

The Board ensures that the Safeguarding and Child Protection Policy and its associated procedures are compliant, up-to-date and effective, and that there is a nominated Safeguarding Children Governor (SCG) who reports formally to the Board annually. The SCG is required to have undergone safeguarding training.

The Board also ensures that the School operates safer recruitment procedures, that there is an effective training program for all staff, and that the Safeguarding and Child Protection Policy and associated procedures are reviewed annually.

The Head

The Head ensures that:

- The Safeguarding and Child Protection Policy and its associated procedures are implemented
- There is a DSL and a deputy appointed and they are properly trained
- There is sufficient time, support and resources for the DSL to carry out his/her duties
- Safeguarding is integral to the curriculum
- All staff feel able to raise concerns about poor or unsafe practices and such concerns are handled sensitively
- All legal and regulatory requirements are met
- All staff are aware of the process for reporting a concern
- He/She works with the DSL in individual cases to decide if further action is needed

The DSLs

The DSLs are members the Senior Leadership team and have ultimate responsibility for all safeguarding and child protection matters in the Schools. This includes acting as a support and source of expertise for staff, ensuring that relevant policies and procedures are known and used appropriately, raising awareness and generating discussion of safeguarding issues and concerns among staff and students, coordinating safeguarding planning and action, and liaising with other agencies as necessary.

The DSLs and their deputies have the necessary status and authority to take responsibility for safeguarding matters, including committing resources and, where appropriate, directing other staff. They will be trained, and their training will be updated at least every two years. Their responsibilities include:

- Ensuring the Safeguarding and Child Protection Policy is regularly reviewed and updated, and is available on the School H: drive and website

- Arranging training as necessary and keeping staff up-to-date with regard to child protection procedures; training and updating will always occur as part of the INSET at the start of the academic year, and thereafter as special needs arise. Currently the School requires new staff to undergo modules supplied by Educare: on a two-yearly cycle, this would be 'Child Protection for International Schools' followed by 'Child Protection Refresher' the following year
- Managing referrals of abuse, or suspected abuse to relevant authorities as appropriate
- Keeping separate and secure written records of all concerns
- Liaising with the HR Director to manage and maintain the Single Central Register
- Liaising with the governor responsible for Safeguarding and Child Protection (SCG) and with the Head as necessary
- Developing links with other professionals, making referrals if necessary.
- Ensuring that when students with child protection plans leave the School, information is passed on to their new schools and, if appropriate, relevant agencies are informed
- Meets with the Child Protection Advisory Network (CPAN) in Nairobi for updates and training. Feeds back to staff and parents as necessary.
- Refers concerns, as necessary, to relevant members of CPAN for professional advice.

In the Senior School, the DSL is Deputy Head Pastoral Mark Buckler; Deputy DSL is Katherine Mubiru-Lwanga.

In the Prep School, the DSL is Deputy Head Pastoral Claire Scott; Deputy DSL is James Gore; Deputy DSL (EYFS) is Karen Hackman.

The Child

As a school, we consider the safety of a child as paramount and the child's welfare is our number one concern. With this in mind, as a school, we have a duty of care to request information and discuss matters with the wider safeguarding team and, if necessary, outside agencies. Wherever possible, we will work alongside parents in this process. However, there are instances where the needs of the child supersede the wishes of a parent and in these instances our duty of care to the child will override all other considerations.

Contact with parents is essential and wherever possible the school will endeavour to keep more than one emergency contact number for each child.

When dealing with younger children, wherever feasible, we will work within the guidelines of the NSPCC (see appendix 3), under the guidance, of Karen Hackman Deputy DSL (EYFS).

The HR Director

The HR Director ensures that all prospective employees provide relevant compliance documentation, checks references, manages Disclosure and Barring Service (DBS) or Certificate of Good Conduct (COGC) applications and keeps the Single Central Register. He/she also bears the overall responsibility for safer recruitment.

The Chaplains and School Counsellor

The Chaplains and School Counsellor play important and unique parts in the pastoral care of students. They work within a well-defined framework of confidentiality and will ensure any issues relating to safeguarding and child protection are passed on to the DSL.

Staff

All staff have a statutory obligation to provide a safe environment in which students can learn and to be aware of the signs of abuse and neglect. They receive safeguarding training every year, as well as regular updates from the safeguarding team and will be familiar with the School's Safeguarding and Child Protection Policy and the associated procedures. They are required to sign that they have read and understood the policy and agreed to comply with the requirements therein.

Please see Appendix 2 for Names and contact details of all relevant staff.

3. Principles

There are six main principles on which this policy is based:

- Adopting good practice
- Establishing a safe environment in which students can learn and develop
- Ensuring the practice of safer recruitment in checking the suitability of all staff to work with children and young people
- Raising awareness of safeguarding issues and equipping students with the skills needed to keep themselves safe
- Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse
- Supporting students who have been abused, in accordance with an agreed child protection plan

3.1 Adopting good practice

All staff have a responsibility to behave professionally in all their dealings with students and, in particular, with those for whom they have a duty of care. They will adhere to the Staff Code of Conduct and will avoid any behaviour that might be misconstrued.

To meet and maintain these responsibilities, all staff will:

- Treat students with respect
- Set a good example by conducting themselves appropriately
- Involve students in decisions that affect them where appropriate
- Encourage positive, respectful and safe behavior among students
- Be good listeners
- Be alert to changes in students' behavior and to signs of abuse and neglect
- Recognise that challenging behaviour may be an indicator of abuse
- Ask a student's permission before initiating physical contact such as assisting with dressing, support during PE, demonstrating technique in a music lesson or administering first aid
- Maintain appropriate standards of conversation and interaction between students and avoid the use of sexualised or derogatory language
- Follow the published guidelines with regard to communication with students and the use of social media
- Be aware that the personal and family circumstances of some students lead to an increased risk of abuse
- Apply reasonable force only as a last resort
- Refer all concerns about a student's safety or welfare promptly to the DSL

3.2 Establishing a safe environment in which students can learn and develop

In order to ensure students are safe at all times, the School will:

- Support students' development in ways that will foster security, confidence and resilience in every aspect of School life including in the formal curriculum
- Provide an environment in which students feel safe, secure, valued and respected, and feel confident and know how to approach adults if they are in difficulty
- Recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting; we will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further help. This could be provided by, for example, the Houseparent, Chaplain, or School Counsellor
- All children in St Andrew's School are taught about Safeguarding and Child protection; this is done at many stages in the school year through chapels, 'moving on up days', assemblies and whole school initiatives. Education and training of this nature is provided by pastoral and academic staff and all staff recognise their mandatory responsibilities to educate, share information and encourage safe and effective care for children.

Guidance on interaction with children

It is important to remember that abuse can take on a variety of forms: physical, emotional, sexual and neglect.

All students have the right to be protected. Child abuse is no respecter of class or wealth. People who abuse children do not necessarily look like "abusers". They may be otherwise quite ordinary and respectable.

All adults who have the charge or care of students have a responsibility to ensure that they are not harmed.

It is vital that the way in which staff conduct themselves when interacting with students minimises the possibility of being accused of misconduct. It is important that staff maintain good practice and care at all times. This is all the more important within a boarding environment like Turi, where we endeavour to foster a warm and positive family atmosphere.

In order to protect students from abuse, and staff from accusations of abuse, the natural inclination to comfort and reassure students through physical contact has to be curbed by considered assessment of the situation.

This does not mean that physical contact is never permissible. It does mean that physical contact must operate within limits that both parties understand, and that contact beyond these limits must be a considered response that can be justified if necessary.

Where these limits lie will vary according to the age of the student and the role of the member of staff. A young student in a Boarding House may well require being comforted and reassured. Prohibition of any physical contact would clearly not be appropriate.

It is not possible to lay down exhaustive rules about what is and is not permissible. However, as a guideline, staff who need to talk to a student privately should do so with both the student and staff member clearly visible by passers-by and preferably with a door open.

It is important for caring adults to understand that certain actions that might seem acceptable to some

can be exploited by others with less worthy motives.

Social media

Social networking sites such as Facebook, Twitter, WhatsApp, Snapchat and Instagram pose risks in terms of professional integrity and the welfare of students. Staff must not use these sites to contact or communicate with current students.

Unfortunately, some students post information on social networking sites that is inappropriate. Viewing such pages may alter a staff member's judgment of a student. In turn, it may alter a student's perception of a staff member. To comment to students about what has been seen is likely to have an impact on your professional reputation as well as possibly causing distress to the students concerned.

Should a staff member become aware of material about themselves, a colleague, the School, or a student, which is inappropriate, the DSL or Head must be informed. They will instruct a member of staff to check the allegations and take the appropriate action. You must not check it out yourself.

Children are informed and educated about the dangers of posting inappropriate photos or text as part of the PSHE curriculum.

Staff should make themselves aware of the full Social Media Policy, which can be found at H:\Staff Policies\Social Media Policy

Online Safety

The School is committed to keeping students safe at all times, especially online. As such, the School employs numerous measures (including school networks and student's personal access: 3G/4G) both educational and preventative, to ensure that children are able to be active online in a safe and secure fashion. There are active measures in place to ensure that relevant staff are alerted to possible breaches in safety.

Please refer to our 'E-Safety Policy' for further details.

Use of reasonable force and restraining students.

Physical contact with students may be for the purpose of care, instruction, control or restraint. Staff should be able to fully justify resorting to physical contact in any situation, and the nature of the contact should be limited to what is appropriate.

Restraining students should only involve the minimum force necessary to protect them from the risk of harming themselves or others, or inflicting damage to property. Where possible, colleagues should be summoned to assist. Staff should record details of such incidents and pass these to the Designated Safeguarding Lead (DSL). At no point is it appropriate to hit a student. Use of reasonable force should not be used as a punishment or to search a student. The use of corporal punishment is expressly forbidden.

Remarks

Staff should be very careful that the remarks and comments made to students could not be construed as suggestive, inappropriate or demeaning. Negative remarks about a student's physical characteristics or development must not be made.

Attachments

A staff member should share concerns with a member of the School management team if he/she feels that a student is becoming inappropriately attached to him/her or to another member of staff. A staff member should also consult a management team member if he/she believes that his/her feelings towards a child or young person place him/her at risk of unprofessional behaviour.

Safeguarding staff against accusations of abuse

Opportunities for abuse exist in all schools, especially boarding schools, and in one-to-one situations such as tutorials, music lessons and interviews.

The simplest advice is to try, as far as possible, to avoid being alone with a student. This may prove difficult, especially in a situation where it may be seen as beneficial for a student to have some opportunity to talk one-to-one with an adult. Where possible, it is sensible to involve another student or adult in the meeting. If this is not possible, the meeting should be arranged with others, where possible, within earshot and/or sight and with doors left open.

Within the Boarding Houses, it is important that staff do not compromise the privacy of students when they are changing or showering. Within girls' Boarding Houses, male members of staff must be extremely careful to ensure that their presence does not cause embarrassment to female students during showering time or when they are changing for games or bed. Female members of staff must apply the same principles to their behaviour when present in boys' Boarding Houses. Staff of the opposite gender must knock, call and wait before entering, unless they perceive a student being at risk. Older students will be rightly sensitive about any staff member walking in to their rooms unannounced when they are changing. More detailed guidelines regarding expectations of Houseparents and other staff involved in boarding are given in the documentation on Boarding.

Excursions out of School, especially residential excursions, are times when abuse might occur. Care must be taken to ensure that there are sufficient adults to provide proper supervision and that the gender balance of the adults and students is appropriate.

3.3 Safer recruitment

The School is committed to safer recruitment, ultimate responsibility for which lies with the Board. The Head and the HR Director are responsible for implementing the procedures. All interviews will include at least one person who has undergone Safer Recruitment training.

These procedures include checks as to the suitability of staff to have contact with students including DBS or COGC and the taking up and checking of references.

Full details of our Safer Recruitment procedures can be found in our Recruitment Policy, which can be found at H:\Staff Policies\Recruitment Policy.

3.4 Raising awareness and equipping children with skills needed to keep themselves safe

We recognise that because of the day-to-day contact with students, staff are well placed to observe the outward signs of abuse and neglect. All staff have a part to play in protecting students from harm.

The School will therefore:

- Ensure students know that there are adults whom they can approach if they are worried. Students who are deemed to be vulnerable will have a key worker (likely to be a member of the Senior

Pastoral Team) in addition to their tutors

- Include opportunities in the curriculum for students to develop the skills they need to recognise and stay safe from abuse
- Raise the awareness of all staff of the need to safeguard students and of their responsibilities to identify and report possible cases of abuse, or suspected abuse
- Communicate to staff through staff meetings
- Communicate to parents through newsletters
- Ensure all staff know the name of the DSLs and their role
- Ensure that parents have an understanding of the responsibility placed on the School and staff for safeguarding, by setting out obligations in the Parent Handbook and on the School website
- Publish the names of the DSLs clearly

3.5 Procedures for reporting abuse

To ensure that the reporting of abuse or the suspicion of abuse is timely and effective, the School will:

- Ensure all staff understand their responsibility to be alert to the signs of abuse and neglect, and to refer any concerns to the DSLs or their deputies
- Keep written records of concerns even where there is no need to act on the matter immediately
- Provide a systematic means of monitoring students known to be, or thought to be, at risk of harm, and contribute to the development of action plans
- Ensure all records are kept separately from the main student files, in a locked location and in a password-protected database with appropriately limited access
- Ensure all staff undergo initial safeguarding training on appointment and further training at least annually
- Keep all matters relating to child protection confidential; the Head or DSL will only disclose sensitive information about a student to other members of staff on a need-to-know basis
- Ensure all staff are aware that they have a professional responsibility to share information in order to safeguard students and that they cannot promise a student complete confidentiality

The School will abide by the law with regard to safeguarding and child protection. If there is a conflict of interest between responsibilities, the School will always act in the best interests of the students.

3.6 Supporting students who have been abused

We recognise that students who have been abused, who witness violence or who live in a violent environment may feel helpless and humiliated, may blame themselves, and may find it difficult to develop and maintain a sense of self-worth. In such circumstances, the School may provide the only stability in their lives.

We also recognise that the behaviour of a student in these circumstances may be normal, or aggressive, or withdrawn. We will ensure any such students are closely monitored and supported, and any concerns are recorded. We will provide continuing support to students in such circumstances when they leave the School by forwarding records, including medical records, under confidential cover to Heads at the students' new schools.

The DSLs and the safeguarding team will work to put the best interests of the child first.

4. Responding when students disclose abuse

Recipients of a student's disclosure of abuse or neglect have a responsibility to observe, record and report, but not to question and test the evidence. In such circumstances staff will:

- Not guarantee confidentiality
- Listen with care
- Reassure the student that he/she is not to blame
- Not show disbelief, but always take the allegation seriously
- Affirm the student's feelings as expressed
- Avoid being judgmental about the information disclosed
- Avoid a 'whodunit' approach
- Avoid an emotive response such as looks of shock etc
- Refer the issue to the DSL
- Sign and date notes made

The primary functions of the member of staff are to listen and record and not to interrogate. Any questions should be aimed at obtaining basic information only, and they must be open ended and not leading. There is a real danger of making evidence invalid should police involvement be needed at a later date. These written records will be passed to the DSL.

Action summary

All cases of suspected abuse should be given the highest priority. The following course of action should be adhered to:

- **LISTEN** to what the student has to say, but remember that you must not ask leading questions or promise confidentiality. You may want to make brief notes during your conversation to aid your memory. Remember not to get distracted. Ensure the student feels that they have your full attention and is being taken seriously
- **REPORT** all suspicions immediately to the DSL or to his/her deputy
- **RECORD** in detail the circumstances (including the nature and extent of injuries) and the action taken, and pass on to the DSL
- **REMEMBER** that it is important to act straightaway

4.1 Dealing with allegations against staff (including the DSL), governors and volunteers

The School has procedures for dealing with allegations against staff, governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 1 and follow Part 4 of KCSIE.

5. Action in respect of false allegations

If an allegation made by a student is found to be false, the School will:

- Refer the matter to the School Counsellor to determine whether the student concerned is in need of help, or may have been abused by someone else
- Consider whether any disciplinary action is appropriate, in the rare event that an allegation is shown to have been deliberately invented or malicious

- Give to the member of staff or student against whom the allegations were made an account of the circumstances and a letter confirming the conclusion of the matter; the member of staff or student may wish to seek legal advice
- Keep securely all records pertaining to the circumstances and investigation
- Take all reasonable steps to support the member of staff or student

6. Safeguarding and Child Protection Framework (SCPF)

The safeguarding and child protection framework includes:

- Safeguarding and Child Protection Policy
- Summary statement to parents
- Safeguarding and child protection training programs
- E-Safety Policy
- Anti-Bullying Policy
- Sexual Harassment Policy
- Camera and Imaging Policy
- Staff Code of Conduct
- Acceptable Use of IT Agreement
- Social Media policy
- Data Protection Policy
- Relationships Among Students Protocol
- Relationships Between Staff and Students Protocol
- Whistleblowing Policy
- PSHE Curriculum
- Prevent Duty
- Equality and Diversity
- Visitor Policy
- Safer Recruitment Policy
- Adults in Boarding House Policy

Compiled by: Deputy Head (Pastoral)

Approved by: The Board

Date of review: January 2019

Date of next review: January 2020

Signed: _____ (Chair of Governors)

Date: _____

Appendix 1

Dealing with allegations against members of staff, the Headmaster, Governor or volunteers

Introduction

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

- parents, guardians or relatives
- the abused student
- other members of staff
- other students
- a third party

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

Since in Kenya there is no Local Authority Designated Officer (LADO) to refer to, the Head will advise on appropriate course of action in conjunction with advice from the Child Protection Advocacy Network (CPAN) if necessary. Both the Head and the DSL must be informed immediately of any disclosure

Anonymous Allegations

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

Procedures

The Head, SCG or DSL will respond immediately and sensitively to the legitimate concerns of the victim and his or her family.

They shall undertake to:

- take any allegation of abuse involving a member of staff very seriously
- establish the facts before jumping to any conclusion
- inform the member of staff honestly of the allegation that has been made and advise them to contact one of the Deputy Heads and/or legal representation for advice and support
- inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place.

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

- involve the Board of Governors and seek legal representation
- consider suspending the member of staff or volunteer concerned
- seek advice from the Director of Children’s Services (Kenya)
- seek advice from the CPAN

Support for the student

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

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

Suspension

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

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

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

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

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

Alternatives to suspension

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

Possibilities include:

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

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

Length of investigatory process

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

Referral of outcomes

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

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

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

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

Recording allegations of abuse

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

Handling unfounded or unsubstantiated allegations

The child

A child who has been the center of unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. The School Counsellor will ensure a professional programme of support. We shall be mindful of the possibility that the allegation of abuse was an act of displacement, making abuse that is actually occurring within the child's own family and/or community. However much support the child may need in such circumstances; we need to be sensitive to the possibility that the aftermath of an unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher. In such circumstances, we may conclude that it is in the child's best interests to move to another school. We would do our best to help them have as smooth a transition as possible, working closely with the parents or guardians.

The member of staff

A member of staff could be left at the end of a unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun them on the grounds of 'no smoke without fire'. If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; we recognise that they are likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the school community. A short sabbatical or period of retraining may be appropriate.

Allegation of abuse of a child who is not a student at the School

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

Allegations involving the Head or DSL and SCG

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

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

Appendix 2

Types of abuse, signs of abuse and specific safeguarding issues for St Andrew's school

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 by 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.

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.

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.

KCSIE acknowledges the following as specific safeguarding issues:

Bullying including cyberbullying (see Anti bullying policy)
Children missing education
Child sexual exploitation (See under Child sexual exploitation)
Domestic violence
Drugs

Fabricated or induced illness
Faith abuse
FGM (see under Female Genital Mutilation)
Forced marriage
Gangs and youth violence
Hate
Mental health
Preventing radicalisation (see under Prevent and Radicalisation)
Relationship abuse
Sexting (see E Safety policy)
Trafficking

Child sexual exploitation:

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

Children Missing in Education

The School recognises its obligation to track, and if needs be, investigate when students are missing in education. Whilst attendance registers are not a legal requirement in Kenya, the School keeps thorough registration records, so it is able to track easily the number of days a student might miss through the academic year.

Given the full boarding nature of the School, missing education is rare, and tends only to be near the start or ends of terms. However, we do recognise our safeguarding responsibility to track and monitor these absences.

To that end, the following steps should be taken when a student is missing from School:

Boarders

1. Any absence from School is reported to the Head
2. The Head will follow up in ascertaining the reason for that absence
3. A note is placed on CPOMS
4. Consideration is given by the DSL as to whether the reason given requires further scrutiny
5. Heads will keep an annual record of absences and reasons, to track any concerning patterns

Day Students

1. Any absence from School is noted on ISAMS, and reported to the School
2. If no reason has been given, the School contacts the parents to ascertain the reason
3. The School keeps a record of absences and reasons on CPOMS
4. Absences from School are reviewed every term, with any concerning patterns reported to the Head
5. The Head raises concerns with parents, should that be deemed necessary

FGM (Female genital mutilation)

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.

It is important that staff are aware of the risks posed to young people in Kenya with regard to Female Genital Mutilation and gender based violence and are consciously active in understanding cultural behaviours, attitudes before holidays and concerns of this nature.

Signs and Symptoms of Female Genital Mutilation

- Difficulty walking, sitting or standing
- Spending a longer period of time in the bathroom
- Displaying unusual behaviour after being off nursery
- Reluctant to being undressed after having a wet accident
- Long unexplained absences

Honour based violence

(HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or **honour**. Female Genital Mutilation (FGM), forced marriages and activities such as breast ironing are all abuse and forms of HBV and should be treated in the same way as any other form of abuse. The school is mindful that its location in East Africa makes it close to 'hot spot' areas risk in terms of HBV and staff are expected to escalated issues and be proactive in passing on any concerns. It is imperative that staff report their concerns to the DSL as a matter of urgency if they suspect a student is particularly vulnerable to FGM.

Prevent and Radicalisation

Protecting children from the risk of radicalisation is seen as part of the schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgment in identifying children who might be at risk of radicalisation and act proportionately

Peer on Peer abuse and sexting

Peer on peer abuse can take many forms including physical, sexual (e.g. inappropriate touching) and emotional abuse (including bullying).

Keeping children safe in education (KCSIE) makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter' or part of 'growing up.'

Peer on peer abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities).

Bullying (including cyber-bullying) can be involved in any type of abuse and is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. Peer on peer abuse should be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm.

All peer on peer abuse and sexting involving those under the age of 18 must be reported to the Designated Safeguarding Lead (DSL) and dealt with as laid out in the Anti-Bully Policy. Details of procedures surrounding sexual harassment/violence are outlined in the Anti Bullying Policy and Sexual Harassment Policy

Students with special educational needs and safeguarding

The School welcomes students with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policy on special educational needs and learning difficulties and disability policy.

Additional barriers can exist when detecting the abuse or neglect of students with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School will always consider extra pastoral support for children with special education needs and disabilities.

The School is mindful in particular that:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's special educational need or disability without further exploitation
- Students with a special education need or disability can be disproportionately impacted by bullying and/or peer group isolation without outwardly showing any signs
- There may be communication barriers which are difficult to overcome to identify whether action under this policy is required.
- The use of reasonable force especially relates to children with special educational needs and disabilities.
- -Where necessary, individual plans for vulnerable children will be draw up to reduce the use of reasonable force.

Guidance is given in UKCCIS: Sexting in schools and colleges

When an incident involving youth produced sexual imagery comes to a schools attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)

- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm appropriate measures should be taken.

Appendix 3

NSPCC Guidance for interviewing a child

Tip 1: Make the interview fun

Children are experts when it comes to their own views, but you can help them express themselves.

Make interviews fun. Think about what children enjoy – it could be colouring in, playing a game, doing a quiz or making something.

Tip 2: Be clear and confirm consent

Make sure the child knows why they are talking to you.

There are lots of reasons children won't understand what you want from them. They might be used to adults making their decisions, worried about the service being taken away or people being cross with them if they don't do the interview.

Make your communications simple. Use short words and sentences or colourful pictures. Maybe make a film of yourself explaining the interview so the child knows what you look like beforehand.

When you're face-to-face, check if they have any questions and slowly go through your information sheet again.

If the child hasn't consented to the interview, you'll need to accept that. Once you've made the preparations, there's a temptation to go ahead. But it's not fair if the child hasn't given full, informed consent.

Tip 3: Create the right atmosphere

The venue should be comfortable to settle the child's nerves. Reduce any distractions, such as traffic noise coming through an open window.

Early impressions are important. The young person will be assessing you as much as you're assessing them.

The atmosphere of the interview is your responsibility. A helpful guide is provided by the psychologist Dan Hughes who suggests the PLACE approach when a child has experienced early trauma. This means being playful, loving, accepting, curious and empathetic in content and style.

Explain when confidentiality might have to be breached. This is an area of particular importance to the NSPCC and we ensure that a possible disclosure of abuse is followed up. In this scenario, your precious interview data is set aside, but the welfare of the child is paramount. There's no other ethical position.

Always keep eye contact with the child or young person, not your paperwork. Using a digital recorder is helpful, enabling the interviewer to focus completely on the child.

Make sure the child consents to recording and pay attention to practicalities. For example, check batteries, position and the time available on the recorder.

Tip 4: Use visuals

Your interview is likely to cover difficult areas that involve feelings, thoughts and wishes. These are hard for a child to express to an adult, especially one they've just met. It's even tougher in the context of abuse, neglect and trauma.

Visuals help. Storyboards can prompt conversation or purchase a simple communication system such as a flannel graph (or flannel board) with cards on particular topics that combine pictures and text. Flip charts can also be used for children to make their own drawings or diagrams. You can then ask questions about what has been drawn and why.

The finished product can be photographed and kept as part of the interview data. Electronic media can be used, but in a screen-saturated world, using low tech is novel for young people and much more hands-on.

Tip 5: Think about who's sitting in

Some children may want another person present to reassure them. It could be a big sister, a foster carer, a residential worker or their pet dog.

Allowing people to sit in is fine if they're clear on their role. Some adults hate silences and try to help the child answer questions. This can compromise data accuracy.

Important Contact Details

Name	Role	Email	Phone Number
Governors			
Marian Brown	Governor with responsibility for Safeguarding	mazbrown.phoenix@gmail.com	0786478961
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Katherine Lwanga	Deputy DSL	katherine.lwanga@turimail.co.ke	0722104213
Prep School			
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James Gore	Deputy DSL	james.gore@turimail.co.ke	0753027645
Karen Hackman	Deputy DSL (EYFS)	Karen.hackman@turimail.co.ke	0737810495
Whole School			
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Janet Ndiho	HR Director	HRDirector@turimail.co.ke	0722276572
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