St Andrew's School, Turi

Safeguarding and Child Protection Policy

Compiled by:	**DSL Prep & DSL Senior**
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Approved by:	**Board of Governors**

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Key Personnel

	Senior School	Prep School	Support Staff
DSL	Mark Buckler Deputy Head Pastoral	Claire Scott Deputy Head Pastoral	
DDSL	Richard Fraser Assistant Head Pastoral	Julia Luvai Assistant Head Pastoral	
DDSL (EYFS & KS1 & 2)		Karen Hackman Assistant Head Primary	
DSOs	Mike Okidia Violet Ojwang Faith Were Nathan Ogadhoh Keeley Wilson Ben Pennington	Elias Mutua Jane Holloway	Joy Kariuki

The Safeguarding Governor is Linda Kangara

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 endeavour 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; **'Director'** refers to the School's Executive Director; '**Head**' refers to both the Head of the Senior School and the Head of the Preparatory School; **'F&S Director'** refers to Finance and Strategy Director; '**DSL**' refers to the Designated Safeguarding Lead (there is a DSL and a deputy in each of the two Schools); **'DSO'** refers to the Designated Safeguarding Officer; '**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) Revised 2012
The Penal Code
The Basic Education Act (2013)

UK Law

Keeping Children Safe in Education (September 2025)
What to do if you're worried a child is being abused (March 2015)
Working Together to Safeguard Children (December 2023)

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

Relationships and sex education (RSE) and health education (July 2025)
Online Safety Act (September 2023)
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' (August 2023) 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 Governor (SCG) who reports formally to the Board annually. The SCG is required to have undergone safeguarding training.

The Board are responsible for ensuring that all staff have understood their Safeguarding Responsibilities as outlined in Keeping Children Safe in Education (August 2025). In addition to this, they are responsible for the strategic leadership of Safeguarding arrangements, which will always operate with the best interests of the child at heart.

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 board has oversight of filtering and monitoring and is involved in an annual review of its effectiveness.

See Recruitment Policy for more details as to step-by-step procedures for recruitment and employment of staff.

The Board will support the DSL role of both schools by:

- Reading the full DSL job description (as part of the Deputy Head Pastoral job description)
- Receive Safeguarding training yearly to fully understand the role of Safeguarding from a whole school context
- Recognise the importance of online safety within the whole school approach to Safeguarding
- Receive safeguarding training at the point of induction to ensure their understanding of their important strategic role, as well as their legislative responsibilities, and those set out by their local multi-agency safeguarding arrangements

The Head

The Head ensures that:

- The Safeguarding and Child Protection Policy and its associated procedures are implemented
- There is a DSL 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
- Liaising with the HR Director to manage and maintain the Single Central Register

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 The National College
- Managing referrals of abuse, or suspected abuse to relevant authorities as appropriate
- Keeping separate and secure records of all concerns, on CPOMS. These are used, as requested and appropriate, to assist in the sharing of information when a pupils transfers to another school
- 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 and 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
In the Prep School, the DSL is Deputy Head Pastoral Claire Scott;
Deputy DSL (DDSL) for EYFS and Key stage 1 and 2 is Karen Hackman.

The DDSL

Responsibilities include:

- Contributing to the School Safeguarding Policy and review process
- Deputising for the DSL as required
- Ensuring that all staff are aware of their responsibility to challenge behaviour which breaches the Staff Code of Conduct.
- Responding appropriately and promptly to disclosures or concerns relating to the well-being of a child (as guided by, or in the absence of the DSL)
- Liaising with the DSL to inform them of any issues and ongoing investigations
- In liaison with the DSL, to refer cases to CPAN as and when necessary
- Supporting the DSL in the investigation of any Safeguarding concerns.
- Working with the Pastoral Team to instigate new well-being initiatives and to support in offering resources to PSHE lessons and Tutor times
- Assisting the DSL in the management of AS Tracking and the analysis of data
- Supporting the DSL in the oversight of CPOMS and iSAMS, along with reviewing case studies to ensure relevant progress is made with support to the student; that closed cases are logged as closed.
- Supporting the DSL in the training of staff and parents, so all are aware of their responsibilities
- Oversight of Anti-Bullying initiatives and recording
- Understanding the policy and procedures in relation to record keeping
- Ensuring that relevant, detailed and accurate written records of referrals/concerns are kept on CPOMS and that these are shared with the DSL and are stored securely
- Maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

It is not the role of the Deputy DSL to investigate allegations of abuse or neglect by members of staff working or volunteering with children in school. This falls to the Headmaster or to the Chair of Governors where the allegation is against the Headmaster.

DDSL (EYFS)
Has oversight and overall responsibility for Safeguarding within the EYFS setting, in accordance with the duties set out above (DDSL)

The DSOs

The DSOs are members of the Academic Staff have responsibility for day to day safeguarding and child protection matters in the Schools. This includes acting as a support and source of expertise for staff, raising awareness and generating discussion of safeguarding issues and concerns among staff and students, assisting in coordinating safeguarding planning and action, and liaising with other agencies as necessary.

The DSO's 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. They support the DSL and DDSL in their roles. DSO responsibilities include:

- Deputising for the DSL or DDSL as required

- Managing referrals of abuse, or suspected abuse to relevant authorities as appropriate
- Managing records of all concerns, on CPOMS
- Liaising with the DSL, DDSL and with the Head as necessary
- Developing links with other professionals, making referrals if necessary
- The consistent implementation of systems designed to fulfil the school's duty with regard to safeguarding and child protection in conjunction with DSL
- Liaising with colleagues, parents, students, and local/national agencies to safeguard students at St Andrew's Turi
- To maintain an awareness of national and local procedures/statutory requirements for Designated Safeguarding Officers (DSO) working at St Andrew's and to regularly lead training for paid or unpaid colleagues and Governors as necessary
- Liaison with the HR Department and SEC to ensure that safer employment procedures are followed
- The maintenance of Child Protection records, ensuring consistency and adherence to statutory policy guidance Training and monitoring
- To assist in the monitoring of trends and discernible patterns relating to safeguarding and student wellbeing
- To attend ongoing training to develop competencies pertaining to the DSO role
- To work collaboratively with the other members of the St Andrew's team in order to develop the safeguarding culture at the school

In the Senior School, the DDSL is Richard Fraser and the DSOs are Mike Okidia, Violet Ojwang, Faith Were, Nathan Ogadhoh, Keeley Wilson and Ben Pennington (Head)
In the Prep school, the DDSL's are Julia Luvai and Karen Hackman and the DSOs are Elias Mutua and Jane Holloway (Head)

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 nine main principles on which this policy is based:

- Adopting good practice
- Establishing a safe environment in which students can learn and develop
- Guidance on interaction with children
- Safeguarding staff against accusations of abuse
- 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 including mental health 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
- Procedure for dealing with Child on Child abuse and Bullying and harassment

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. Staff should also be aware of the intimate care procedure, which can be found in the Medical Care Policy. 'Intimate care' can be defined as any care which involves washing, touching or carrying out a procedure to intimate personal areas which most people usually carry out themselves, but what some children are unable to do because of their young age, physical difficulties or other special needs.

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 behaviour among students
- Be good listeners
- Be alert to changes in students' behaviour 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.

3.3 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.

3.4 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.

Staff should be professional in all their dealings with pupils or students in their care. The need to maintain this professional relationship should be considered in interaction with children inside and outside the school day, this includes communication through professional platforms such as teams and email and teachers should lead by example in not communicating in 'unsociable hours'.

Staff should not be in contact with students through social media and should consider each platform as private and adjust such settings appropriately. It is not advisable to use personal phones to photograph students/pupils but if this is absolutely necessary then such photos should be deleted after sharing them with internal promotions or shared with the marketing team. Further information on social media can be found on the social media policy.

Staff Code of conduct

The Code of conduct sets out the key principles of good conduct and practice for all members of staff and volunteers at St Andrew's. It is intended to guide their judgements and decisions and inform parents, students and the general public of the standards they can expect from St Andrew's employees.

There are clear principles of conduct and practice for staff at St Andrew's based on the School's three Values: Courage, Integrity and Compassion

Further information regarding the following can be found in the **Appendix 5** of this document

3.5 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.

3.6 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 and develop their knowledge of safeguarding
- Raise the awareness of all staff of the need to safeguard students and their responsibility to identify and report possible cases of abuse, or suspected abuse and report cases to the DSLs.
- 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

3.7 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 via CPOMs. In the case of an individual not being able to access CPOMs, they are to contact the DSL directly
- 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 student.

3.8 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.

As a school we recognise that mental health issues could be an indicator of abuse and neglect. Effective pastoral support, tutoring, mentoring and student led committees all help identify possible mental health issues and though our School Counsellor and Doctor we establish whether they may lead to a safeguarding concern.
The DSLs and the safeguarding team will work to put the best interests of the child first.

3.9 Procedure for dealing with Child on Child abuse and Bullying

The school will ensure that staff do not dismiss instances of Child on Child abuse, including sexual violence and sexual harassment as an inevitable part of growing up. Victims will be appropriately supported. Any indication that a child has suffered from Child on Child abuse will be dealt with under the child protection procedures outlined in this policy.

Training is provided to staff about recognising and responding to Child on Child abuse, including raising awareness of the gendered nature of child on child abuse, with girls more likely to be victims and boys perpetrators. Consideration will always need to be given to the welfare of both the victim (s) and perpetrator (s) in these situations.

As a school we take every opportunity to teach and train both staff and teachers in all aspects of Child on Child abuse.

As part of our Preventative Education and in addition to our curriculum based learning, the school promotes Safeguarding (Preventative Education) in some of the following ways (this is not an exhaustive list):

- PSHE and RSE curriculum
- 'Drop down days' or 'Moving On Up Days'
- Tutor times
- Assemblies
- Group counselling sessions

Each boarding house also has a robust and timely flow chart for the action of such cases, detailing the steps to take.

Quick and timely reporting is vital to the management of Child on Child abuse and students are apprised of the lines of communication that are open and who to contact. This is publicised throughout the boarding houses.

As a school we do not take just a reactive response to Child on Child abuse but recognise the international scale of the issue and encourage parents to hold us to account on this aspect of our duty to young people in our care.

Within our school we consider:

- The different variants of Child on Child abuse within the school
- The makeup of the student body, and such factors that might make them vulnerable to Child on Child abuse
- which of these students are affected, or are more at risk of being affected, by Child-on-Child abuse
- the various sociocultural contexts to which those students are associated including, for example, their peer group
- We monitor incident logs and assess behavioral trends through CPOMs

Within our school, we are committed to supporting all students who are facing bullying howsoever arising. There is a designated member of staff in each school who is committed to supporting students who may be more at risk from bullying and harassment and those staff are made known to students.

Sexual Violence and Harassment between children

The school recognises that sexual violence and sexual harassment can occur between two children of any age and sex and that its staff are expected to maintain an attitude of 'it could happen here'. Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to 'unwanted conduct of a sexual nature' such as comments, sexual taunting or physical behaviour such as deliberately brushing against someone. Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, and sexual exploitation coercion and threats.

The school will not tolerate sexual violence and sexual harassment and will provide training on how to manage a report of sexual violence or harassment. All decisions will be made on a case by case

basis. The school will consider both the victim and perpetrator and any others children and staff involved, offer appropriate support and reassure the victim that he/she is being taken seriously. The wishes of the victim, like in any bullying case, will be taken into consideration when decision making. Support will also be given to any siblings of those affected by sexual violence and harassment between children.

Further guidance can be found in 'KCSIE part 5', Child on Child sexual violence and sexual harassment

Sexting and school action

When an incident involving youth produced sexual imagery comes to a school's 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.

4. Social Media and Online Safety

- 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, and may in turn affect the student's perception of the staff member. Commenting to students about what has been seen is likely to impact professional reputation and could cause 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 Designated Safeguarding Lead (DSL) or Head must be informed immediately. They will instruct a member of staff to check the allegations and take the appropriate action. Staff must not investigate such matters themselves.
- Children are informed and educated, through the PSHE curriculum, about the dangers of posting inappropriate photos or text, and are also taught how to recognise and respond to online risks, including **misinformation, disinformation, and conspiracy theories**, which are now explicitly recognised in KCSIE 2025 as safeguarding concerns.
- 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 a range of measures—both educational and preventative—to ensure that children can be active online in a safe and secure way. This includes consideration of school networks and students' personal access (e.g. 3G/4G).
- We provide a careful balance of filtering and monitoring, ensuring restrictions are not unreasonable but remain effective. Active measures are in place to alert relevant staff to possible breaches in safety.

- In line with KCSIE 2025, the School recognises the importance of using government-recommended digital safety tools, such as the DfE's *Plan technology for your school* resource, to help evaluate and strengthen filtering and monitoring systems. The School also remains aware of evolving risks posed by new technologies, including **generative AI tools**, and will continue to adapt its approach to online safeguarding accordingly.
- Staff are kept informed about how the School protects students online, including the use of filtering and monitoring systems such as Smoothwall. Updates are shared regularly by the IT Director and DSL as part of ongoing safeguarding training.
- Please refer to our 'E-Safety Policy' for further details.

4. 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.

5. Remarks and attachments

- 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.

- 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.

6. Responding when students disclose abuse

Staff are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused. 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.

7. Dealing with allegations against staff (including the DSL, Heads, Director, Governors and Volunteers)

The School has procedures for dealing with allegations against staff, heads, director, 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.

The school is committed to learning from all allegations, not just those concluded, unsubstantiated or substantiated.

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

9.1 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

10. Whistleblowing

The School recognises that it needs to provide a mechanism by which all Governors, members of staff, including temporary staff and volunteers (paid and unpaid), can bring matters of concern to the attention of the School Executive. This mechanism is set out in the School Whistleblowing Policy.

All staff have a responsibility to raise concerns, despite any difficulties that that might pose, particularly if the concern relates to the welfare and safeguarding of students.

Employees must acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk.

All staff are trained to follow the mantra of “Don't think what if I'm wrong - think what if I’m right.”

11. 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
- Use of Images of Children Policy
- Staff Code of Conduct
- Acceptable Use of IT Agreement
- Social Media policy
- Data Protection Privacy Notice 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 accommodation declaration

Appendix 1

Dealing with allegations against staff (including the DSL, Heads, Director, Governors and Volunteers)

Introduction

Allegations that a member of staff has abused a student or students either inside the school premises or during a school trip / visit or they have behaved in a way that indicates that they may not be suitable to work with children 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 - https://sites.google.com/a/isk.ac.ke/child-protection-advocacy-netw/) and the Kenyan Anti Human Trafficking and Child Protection Unit (AHTCPU - ndirangugrace1@dcicpu.co.ke) 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.

Low Level Concerns

Keeping Children Safe in Education September 2024, includes specific advice about the reporting of low-level concerns. If the concern does not meet the threshold to report to the LADO (in a UK context) or is inconsistent with the staff code of conduct, including inappropriate conduct outside of school, it is considered a 'low-level' concern and should be reported to a section DDSL or DSL. The term low-level does not mean that it is insignificant, it means the behaviour towards the child does not meet the harms threshold. (KCSIE 2025)

Examples of such behaviour could include, but are not limited to:
• being over friendly with children;
• having favourites;
• taking photographs of children on their mobile phone without reason;
• engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
• using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold see Part four: KCSIE {August 2025}, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

All low-level concerns should be recorded on the Low-Level Concern form by the DSL or DDSL and include details of the concern and action taken and the name of the person raising the concern should be noted. If the person raising the concern wishes to remain anonymous then that should be respected as far as reasonably possible. The DSL or DDSL will investigate the concern to determine what further action may need to be taken by collecting relevant information, including speaking with the person raising the concern, speaking with the individual involved and any witnesses.

The DSL or DDSL will present their findings to the Head. These will be signed off and stored by the Head if it is agreed that the concern is low-level. Records will be retained until the individual leaves their employment. All low-level concerns about staff should be reported not just abuse allegations.

If the concern has been raised via a third party, the Head will collect as much evidence as possible by speaking with the person raising the concern, the individual involved and any witnesses to determine what further action may need to be taken. The information will be recorded with the rationale for the decisions and action taken which may include being considered to meet the harms threshold. These records should be reviewed to identify patterns of behaviour, issues within the school, any training required etc.

In some circumstances an allegation may be made against an individual not directly employed by the School, where its disciplinary procedures do not fully apply, such as a contractor or volunteer. Whilst the School is not the employer, the School recognises its responsibility to ensure that the allegation is dealt with properly, in conjunction with the Agency where applicable. In no circumstances will the School cease to use a contractor or volunteer due to safeguarding concerns, without finding out the facts and liaising with the relevant authority to determine a suitable outcome. The School will use the guidance given in KCSIE Part 4 to managing such allegations.

If such a concern is about the DSL then it should be reported to the Head.

If a report is determined to be unsubstantiated, unfounded, false of malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. If the report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it under the School's Code of Conduct.

The School will work to ensure it creates an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

References

The School will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the Board of Governors and found to be substantiated, it should be referred to in a reference.

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 Teacher Regulation Agency (TRA) 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 centre 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. As a School we work to achieve a balance of supporting the child, while challenging the behaviour. While we will work to support the child as much as possible, we also recognize that their behaviour may need to be challenged in line with our Behaviour Policy.

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 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. 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. Indicators of serious youth violence: a child may be a victim of serous youth violence if there are signs of the following:

- Reduced attendance
- Changes in friendship groups
- There are concerns about a child's performance.

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.

Domestic Abuse: Domestic abuse can potentially have short-term and long-term detrimental impact on children's health, wellbeing, and ability to learn if they are experiencing domestic abuse at home or within their own intimate relationships. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

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
Gender questioning children
Misinformation, disinformation and conspiracy theories.

In line with KCSIE September 2025, we as a School make staff aware of the risks of Child Sexual and Criminal Exploitation, alongside serious violence. The below text gives an overview of these harms and how to identify children who may be at risk of these harms:

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.

Child Criminal Exploitation

Child criminal exploitation (CCE) takes a variety of forms but ultimately it is the grooming and exploitation of children into criminal activity.

Recently, CCE has become strongly associated with one specific model known as 'county lines', but it can also include children being forced to work in cannabis factories, being coerced into moving drugs

(often forced to insert drugs in their vagina or anus in a practice known as 'plugging') or money across the country, forced to commit financial fraud, forced to shoplift or pickpocket.

While County Lines refers to children based in the UK, we must still recognize that our students may be vulnerable and we should be vigilant in recognizing the signs of CCE. These may include: unexplained absence from school, a change in personality, the child exhibiting stress, worry or fear, a child arriving at school with unexplained gifts or expensive items which parents have not provided for them.

Voyeurism (Offences) Act 2019)

Voyeurism involves amongst others, upskirting; (the action of placing equipment such as a camera or mobile phone beneath another person's clothing to take a voyeuristic photograph or record an image without their permission); observing and / or recording another person doing a private act (as defined in the UK Sexual Offences Act 2003) for the purposes of amongst others to cause humiliation, alarm and distress.

Children Missing in Education

The school recognises its obligation to track, and, if necessary, investigate when students are unexplainably missing from education or persistently absent. Whilst attendance registers are not a legal requirement in Kenya, the School keeps thorough registration records so it is able to track the number of days a student might miss during the academic year.

Given the full boarding nature of the school, missing education is rare and tends only to occur near the start or end of terms. However, we recognise our safeguarding responsibility to track and monitor any absences carefully.

In line with the statutory guidance *Working Together to Improve School Attendance* (now referenced within *Keeping Children Safe in Education 2025*), the school acknowledges that persistent or unexplained absence may be an indicator of safeguarding concerns. Attendance monitoring therefore forms part of our safeguarding practice, and concerns will be escalated to the Designated Safeguarding Lead (DSL) without delay.

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 where appropriate
4. Consideration is given by the DSL as to whether the reason given requires further scrutiny
5. Annual record of absences and reasons are kept, to track any concerning patterns

Day Students

1. Any absence from School is noted on EdAdmin, 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

When a child leaves the school, we will make every effort to ensure they are rehoused in a suitable school and we will pass on relevant Safeguarding information, as requested.

If a child joins us from another school, we will request Safeguarding information to ensure we can provide the student with the best possible support and care.

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 abuse

(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 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 profile of a child who may be susceptible to extremist ideology; radicalisation can occur in many different ways and settings. A range of background factors may contribute to a child's vulnerability, often combined with specific influences such as family, friends, peers, or online

content. Extremist or terrorist groups may appear to provide answers to unmet needs or offer a sense of belonging.

The internet and social media are now major factors in the radicalisation of young people, including exposure to conspiracy theories, extremist content, and online grooming. Staff should remain vigilant for changes in a child's behaviour, attitudes, or interactions that could indicate they are at risk, just as they would for other safeguarding concerns.

Staff are expected to use their professional judgment to identify children who might be vulnerable to radicalisation and respond proportionately, seeking advice from the DSL or appropriate agencies where necessary.

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:

- Indicators of possible abuse such as behaviour, mood and injury can relate to the student's special educational need or disability
- 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.

Appendix 3

Early help, recognising a 'Child in Need' and a 'Child at Risk'

With regard to early help in St Andrew's School, we subscribe to the guidance given by UK legislation but are not able to offer the sort of support given through the Common Assessment Framework in the UK. We do recognise that early reporting and help of a child is paramount in the managing of potential needs.

The referral system through CPOMs offers the school the opportunity to notify those relevant people to additional help that may be necessary or deemed as a 'Child in Need'.

We recognise the need for early help through external agencies (or through internal process) to best support the child, such examples of multi agencies are referenced in the MDT Contact list through 'The Child Protection Advocacy Network' (CPAN).

Although the support for children is different in Kenya (to the UK) and the official options for Child in Risk and Child in Need is more limited. We do recognise a child who has suffered or is likely to suffer significant harm through emotional ill treatment, physical injury (including Female Genital Mutilation (FGM)), forms of neglect, child sexual exploitation (CSE) and other forms of abuse may lead to students of any age being considered "at risk".

Being alert to the possibility that students may be "at risk" (and knowing how to respond, report and refer) is a responsibility for all staff at St Andrew's School. Child Protection concerns are responded to, reported, and referred in the ways this policy describes and in accordance with advice and support from CPAN.

Although some students may have a need for additional support, they may not be considered "at risk" but would be classed (within the UK framework) as "child in need". For some students there may need to be an assessment of risk conducted by the school.

A child may benefit from early help but staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Is at risk of being radicalised or exploited
- Has special educational
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect

Appendix 4

Important Contact Details

Name	Role	Email
Governor		
Mbuvi Ngunze	Chair of Governors	mngunze1@googlemail.com
Dr Linda Kangara	Governor with responsibility for Safeguarding	drkangara@yahoo.com; drlkangara@gmail.com
Senior School		
Ben Pennington	Head & DSO	headseniorschool@turimail.co.ke
Mark Buckler	DSL	deputyseniorpastoral@turimail.co.ke
Richard Fraser	DDSL	Richard.Fraser@turimail.co.ke
Mike Okidia	DSO	mike.okidia@turimail.co.ke
Violet Ojwang	DSO	violet.ojwang@turimail.co.ke
Faith Were	DSO	Faith.Were@turimail.co.ke
Nathan Ogadhoh	DSO	nathan.ogadhoh@turimail.co.ke
Keeley Wilson	DSO	Keeley.Wilson@turimail.co.ke
Prep School		
Jane Holloway	Head & DSO	headprepschool@turimail.co.ke
Claire Scott	DSL	deputyheadpreppastoral@turimail.co.ke
Julia Luvai	DDSL	Julia.Luvai@turimail.co.ke
Karen Hackman	Deputy DSL (EYFS)	karen.hackman@turimail.co.ke
Elias Mutua	DSO	Elias.Mutua@turimail.co.ke
Whole School		
Geert Simons	Executive Director	Director@turimail.co.ke

Wayne Hackman	Chaplain	chaplain@turimail.co.ke
Maureen Arwa	Head of Human Resources	HRDirector@turimail.co.ke
Mary Wanjala	School Counsellor	schoolcounsellor@turimail.co.ke
Jonathan Thurlow	School Doctor	doctor@turimail.co.ke
Joy Kariuki	Health & Safety Officer	Health.safety@turimail.co.ke
Zoe Nightingale	Independent listener	Independentlistener@turimail.co.ke
External agencies and support		
Rose Mbanya	Advocate of the High Court of Kenya	0722573697 WhatsApp: +254 722 573697 rmbanyaadv@gmail.com
Prudence Muteso	Lawyer & Advocate of the High Court of Kenya	0722102440 WhatsApp: +254 722 102440 Prudencemutiso@gmail.com
Mueni Mutisya	Head of Child Protection Unit -DCI	0724882272 WhatsApp: +254 724882272 mutisyamueni@gmail.com
Kelvin Lay	Law Enforcement Expert/Anti Human Trafficking and Child Protection Unit/ Qumodo Tech	WhatsApp: +44 7399609999 Kelvin.lay@qumo.do
Waqar Qureshi	Lead Investigator/National Crime Agency/Child Exploitation Online Protection (NCA CEOPS)	0719228486 WhatsApp: +254 719228486 waqar.qureshi@nca.x.gsi.g ov.uk
Penina Kanyithia	Department of Children Services Kenya	westlandsscco@gmail.com
Teacher Service Commission (TSC)	County Director – Nairobi	PO BOX 49416-001000 Nairobi GOP Phone: 0202892000
KAIIS PA and Government Consultant	Kenyan Association of Independent International Schools (KAIIS)	Jane Nduta Phone: +245720793972
COBIS Vice Chair of the Board Dr Steffen Sommer	COBIS Board Safeguarding Committee	+44 20 3826 7190 Email: pa@cobis.org.uk

Appendix 5

Staff Code of Conduct 2024.pdf