

CHILD PROTECTION AND SAFEGUARDING POLICY (including low-level concerns)

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1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Maintained schools governance guide](#).

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM .
- The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.

- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the '2018 Childcare Disqualification Regulations') and [Childcare Act 2006](#), which set out who is disqualified from working with children.
- This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- Any other relevant Hong Kong ordinance equivalent to the UK Laws above.

3. Definitions

For the purposes of this policy, the terms "students" and "children" designate all individuals enrolled at Kellett School. This definition encompasses members of the Sixth Form, regardless of whether they have reached the age of 18. Accordingly, even when a student attains legal adulthood, the school remains committed to adhering to established child protection and safeguarding protocols.

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is 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.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18 and Sixth Form students whether they have reached the age of 18 (see top of section).

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have Additional Support Needs (ASN) and disabilities or health conditions.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an Additional language (EAL).
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers / refugees.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.
- Are missing or absent from education for prolonged periods and/or frequently.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school. Our policy and procedures also apply to extended school and off-site activities.

Kellett school comprises of three schools (two Prep and one Senior) on two campuses. There is a Whole School Safeguarding Lead (WSSL) and additionally, each school has a DSL. The three DSLs take lead responsibility for child protection and wider safeguarding in their school. This includes online safety and understanding our filtering and monitoring processes (with the school digital leads) on school devices and school networks to keep pupils safe online.

5.1 The Principal is responsible for:

- Ensuring the following appointed positions are in place within the Safeguarding Team:
 - Whole School Safeguarding Lead (WSSL) at Head level with a whole school responsibility.
 - Designated Safeguarding Leads (DSL) are appointed at Deputy Head level on each campus.
 - Deputy Safeguarding Leads (dDSL) are appointed.
 - Safeguarding Liaisons (SL) are appointed in various positions, carrying out a supportive role towards the local community and authorities.
 - Safeguarding Governor (SG) is appointed from the Board of Governors.
 - Safeguarding Team (SGT) that is made up of the entire group of DSL and dDSL, led by the WSSL. The structure of the team is shown in Appendix 1.
- Ensuring compliance to this policy
 - Working alongside the SGT in cases requiring referral to an outside agency.
 - Working with the SGT to provide an additional level of support to all members of the Kellett community in regard to Safeguarding issues where necessary.
 - Acting upon allegations involving members of staff.
- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction.
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
 - Communicating this policy to parents/carers when their child joins the school and via the school website.

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
 - Acting as the 'case manager', in the event of an allegation of abuse made against another member of staff or volunteer, though they may wish to delegate this to a head of School.
 - Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
 - In Early years ensuring the relevant staffing ratios are met.
 - Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting.

5.2 The whole school safeguarding lead (WSSL) is responsible for:

- Roles and Responsibilities within the Safeguarding Team.
- Ensuring the Team is fully trained and compliant with all Safeguarding procedures.
- Organising half-termly meetings of the SGT.
- Preparing reports for the Board of Governors.
- Ensuring annual policy review.
- Ensuring the SGT is properly equipped to carry out its duty.
- Administrative oversight of CPOMS.

5.3 The Safeguarding Team (SGT) is responsible for:

- Establish and maintain an environment where students feel safe and secure and are encouraged to talk and are listened to.
- Inform all adults in our community of best practice with regards to safeguarding children in recognition that safeguarding is a shared responsibility.
- Ensure that the procedures for dealing with safeguarding are shared with all staff and that regular training occurs to support best practice.
- Ensure that students know that there are adults within the school who they can approach if they are worried or in difficulty.
- Ensure that wherever possible every effort will be made to establish effective working relationships throughout our wider community including those from partner agencies.
- Identify opportunities and activities within the curriculum which equip students with the skills they need to stay safe from abuse.
- Provide support to all members of the Kellett community in regard to Child Protection issues.

5.4 The designated safeguarding leads (DSLs) are responsible for:

- During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns.
- Acting as cover when DSL is absent (If the DSL and deputies are not available, the WSDLS will act as cover).
- Ensuring that all safeguarding procedures are followed within the school, and to make appropriate, timely referrals to any relevant authority, when required, in accordance with school procedures.

- Informing all staff about safeguarding responsibilities and procedures through annual training, offering support and advice when required.
- Ensuring that all adults have access to information on best practice when working with students.
- Informing all students about adults in the school that they can approach if they are worried or in difficulty.
- Ensuring that students accused of abuse are supported according to this policy.
- Keeping records of all safeguarding concerns.
- Making the decision as to whether reported safeguarding concerns be escalated to a formal record of concern.
- Securely passing information between campuses or schools at times of transition.
- Requesting information from feeder schools regarding any specific child protection concerns.
- Ensuring that the school is represented, or a report is submitted to any child protection conference called for a student on their school roll or previously known to them. They will continue to offer support in accordance with the outcomes from the Multidisciplinary Case Conference.
- Keeping Head of school informed of any issues.
- Liaising with school NGO social workers.

5.5 All staff

- All staff are expected to read and understand part 1 of [Keeping Children Safe in Education](#) (KCSIE) annually. Additionally, staff who work directly with children are also expected to read and understand annex B of KCSIE (about specific safeguarding issues) annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff, the role and identity of the designated safeguarding leads (DSLs) and deputies, the behaviour policy, the technology responsible use policy and more generally, online safety that includes the expectations, and the digital leads responsibilities in relation to filtering and monitoring.
- The process for reporting up and the school's responsibility to make referrals to the Social Welfare Department .
- Their responsibility regarding Hong Kong mandatory reporting when it becomes statutory.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.
- That a child and their family may be experiencing multiple needs at the same time.
- What to look for to identify children who need help or protection.

5.6 The governing board is responsible for:

- Acting upon reports to the Board from the SGT as required.
- Appointing a designated Safeguarding Governor.
- Acting upon allegations involving the Principal.
- Receiving appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge. This is so they can be assured that safeguarding policies and procedures are effective and support your school to deliver a robust whole school approach to safeguarding.
- Being aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty (PSED) and any arrangements to work in a multi-agency way within HK.
- Ensuring that:
 - The Designated Safeguarding Leads (DSL) have the appropriate status and authority to carry out their job. Governing bodies need to give the DSLs the additional time, funding, training, resources and support needed to carry out their role effectively.
 - Online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies/procedures.
 - The leadership team and relevant staff are aware of and understand the filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns), about staff members (including supply staff, volunteers and contractors).
 - The child protection policy reflects that children with additional support needs (ASN), disabilities or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact

and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so).

- Seek assurance that where another body is providing services or activities, that they have appropriate safeguarding and child protection policies/procedures in place. This applies regardless of whether or not the children who attend these services/activities are children on the school roll/attend the college.

5.7 The Director of People and Culture

Is responsible for ensuring that all existing staff sign a declaration of criminal convictions annually and that all staff have signed a safeguarding register to confirm that they have read and understood the policy.

5.8 The Senior Leadership Team (SLT)

Is responsible for ensuring that the school follows safe recruitment processes and giving final approval to amendments to safeguarding policy as recommended by the SGT.

5.9 Others who volunteer or visit the school

- Parent/ Volunteer helpers or visitors who have regular contact (at least three times in a month) with students. For avoidance of doubt a Parent/Volunteer may be in school but never left alone with students. They must undertake Safeguarding/Child Protection training.
- Other adults may visit the school for a range of reasons. This might include, health professionals, counsellors, social welfare department staff, examiners, university staff visiting speakers, all of whom need to understand their role in keeping children safe and follow policies and procedures in relation to this. Such visitors and volunteers will not have unsupervised access to students. All such visitors and volunteers will undergo:
 - All volunteers are required to make a formal declaration that they do not have any criminal convictions that would bar them from working with children and will have ID check on arrival.
 - Note: Hong Kong Police Checks are only available to employees of an organisation; therefore, it is not possible for us to vet volunteers in this way.
 - The School will not conduct Police checks on Parent/ Volunteer helpers for one-off events (such as helping on a school trip). This is because Parent / Volunteer helpers are never alone with children.
 - All volunteers who have regular contact are required to make a formal declaration that they do not have any criminal convictions that would bar them from working with children.
 - It is a Safeguarding requirement that the school is informed of all visitors to campus who interact with students at any time. Staff should notify the People and Culture Department of any visitors in a minimum of 7 days in advance. The Host Declaration Form is an online form and is linked on the

Staff dashboard. The staff teacher arranging the visit asks to see (and verify likeness) photo ID upon their arrival.

5.10 Safeguarding training requirements for individuals are:

Role	Training Required	Timeframe
Any new staff member	Safeguarding Training (Level 1)	Induction Period (1st month)
Newly appointed members of the SGT	Safeguarding Training (Advanced)	As soon as possible on appointment but must be in first year
All members of the SGT	Safeguarding Training (Advanced)	Every 2 years
All Kellett employees	Safeguarding Training (Level 1)	Annual
Regular Outside Users	Safeguarding Training (Basic)	Every 2 years
Safeguarding Governor	Safeguarding Training (Advanced)	Every 2 years
Principal	Safeguarding Training (Advanced)	Every 2 years
Board of Governors	Safeguarding Training (Level 1)	On appointment as Governor

6. Confidentiality

- All disclosures received or observations made by an adult must be kept confidential and passed on directly to the DSL, at the earliest possible opportunity.
- Relevant individuals will be informed of any information in respect to specific cases regarding child protection on a need-to-know basis. All information shared in this way must be held confidentially.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

- Regarding anonymity, all staff will:
- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- If staff are in any doubt about sharing information, they should speak to the WSSL/DSL (or a Deputy)

7. Recognising abuse and taking action

The presence of any one or a combination of these indicators is not in itself any proof of child abuse, although the presence of these indicators should alert us to the possibility that a child may be at risk.

Signs or symptoms which may indicate **neglect**:

- Hunger
- Tiredness or listlessness
- Child dirty or unkempt
- Consistently poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection demanding or attention seeking behaviour
- Untreated or recurring illnesses/injuries
- Severe rash or skin diseases
- Stealing or scavenging compulsively
- Failure to thrive
- Failure to develop intellectually or socially

Signs or symptoms which may indicate **physical abuse**:

- Inconsistent or unexplained account of how injuries occurred patterns of bruising
- Finger, hand and nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations, abrasions, welts
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning

- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or overcompliance
- Violence or aggression towards others including bullying

Signs or symptoms which may indicate **psychological or emotional abuse**:

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical/mental/emotional development
- Sudden speech disorders, elective mutism/deafness
- Inappropriate emotional responses - seeking affection
- Disruptive behaviour or conduct problems
- Marked deterioration in academic performance
- Rocking, banging head, regression
- Self-mutilation, drug or solvent abuse
- Social withdrawal
- Suicidal thoughts
- Fear of parents being contacted
- Running away, compulsive stealing
- Appetite disorders – anorexia, bulimia
- Soiling, smearing faeces, enuresis

Signs or symptoms which may indicate **sexual abuse**:

- Sexually explicit play or behaviour or age-inappropriate behaviour
- Anal or vaginal discharge, soreness or scratching
- Difficulty walking or sitting
- Pregnancy
- An unusual or unexplained period of absence
- Truancy, lateness, reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate, elective mute
- Thrush or other sexually transmitted infections
- Persistent complaints of stomach disorders or pains
- Eating disorders, e.g. anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation

- Unusually compliant
- Regressive behaviour
- Enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Excessive reaction to being touched
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches, etc., in genital area
- Lack of trust in a familiar or particular adult

Further guidance on definitions of abuse **Domestic abuse:**

- Children who witness domestic abuse are also victims
- Witnessing domestic abuse can have a lasting impact on children
- Children can be victims, and perpetrators, in their own relationships too
- The abuse can be physical, sexual, financial, psychological or emotional
- Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships)
- Harm can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

- If you believe a child is in immediate danger and you have no time to tell the DSL, contact the Social Welfare Department / Police. Anyone can make a referral.
- Tell the DSL as soon as possible if you make a referral directly.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Tell them it is not their fault.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL as soon as possible.

It is important that you **do not**;

- Promise confidentiality. You cannot keep secrets if you think they or others are in danger.
- Interrogate, investigate or ask why.
- Transmit anger, shock or embarrassment.
- Interrupt, speculate or accuse anyone.
- Tell the child to go and talk to someone else.
- Assume, e.g. this child tells lies.
- Talk to anyone but the DSL/Principal about what the child has said.

Bear in mind that some children **may**:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 Child-on-child abuse: Allegations of abuse made against other students

- Kellett School recognises that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".
- We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.
- Most cases of a student hurting other students will be dealt with under our school's behaviour policy, but this procedure will apply to any allegations that raise safeguarding concerns.
- This might include where the alleged behaviour:
 - Is serious, and potentially a criminal offence.
 - Could put students in the school at risk.
 - Is violent.
 - Involves students being forced to use drugs or alcohol.
 - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting).

7.4 If a student makes an allegation of abuse against another student

- You must record the allegation and tell the DSL, but do not investigate it.

- The DSL will contact the social welfare department and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact any additional mental health professionals if necessary.

7.5 We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent.
- Ensuring students know they can talk to staff confidentially by referring to the Wellbeing Team.
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

7.6 Sharing nudes and semi-nudes (sexting)

- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

- You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.
- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff.

This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s).
- If a referral needs to be made to the police and/or social welfare department.
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed).
- What further information is required to decide on the best response.
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the students involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the students involved (in most cases parents should be involved).

The DSL will make an immediate referral to police and/or social welfare department **if**:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to ASN).
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any student in the imagery is under 13 (based on UK law).
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).
- If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or social welfare department.
- If at the initial review stage, a decision has been made not to refer to police and/or social welfare department, the DSL will conduct a further review.
- They will hold interviews with the student(s) involved (if appropriate) to establish the facts and assess the risks.

- If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to social welfare department and/or the police immediately.
- The DSL will then inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Recording incidents

- All sexting incidents and the decisions made in responding to them will be recorded.

7.7 If you discover that FGM has taken place or a pupil is at risk of FGM

- Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’ ‘circumcision’ or ‘initiation’.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the DSL.

7.8 If you have concerns about extremism

Where there is a concern, report to the DSL.

7.9 If you have a concern about mental health

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action and report to DSL.

7.10 Home Learning

- The procedure concerning Home Learning is put in place when students (or staff) are unable to attend school but are required to attend school / deliver education from home. These safeguarding procedures operate in conjunction with the school’s policy on Home Learning.

- Where staff are interacting with children online, they will continue to follow our existing staff behaviour policy and IT acceptable use policy.
- Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures.
- It is the responsibility of the Safeguarding Team to make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.
- It is the responsibility of the DSL on each campus to make sure parents and carers:
 - Are aware of the potential risks to children online and the importance of staying safe online.
 - Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school.
 - Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides.
 - Know where else they can go for support to keep their children safe online.
- Parental involvement during video sessions - the same rules of communication apply as if this were a regularly taught lesson, meaning that the interaction in these lessons are between the teacher and the pupils alone.
- When staff need to have individual one-to-one video sessions with students, the following applies:
 - One-to-one sessions with students follow the same guidance as one-to-one conversations in school.
 - When at school, staff should ensure that the door is open, and that another member of staff is aware and nearby whilst the conversation is taking place.
 - Where this is not possible, for example when staff are working from home, the meeting is recorded and the video is downloaded afterwards for storage on the school's cloud service.
 - These recorded videos are kept for 14 days after which they are deleted.
 - These individual recordings are logged in a centralised register. Each department is responsible for its own register.

7.11 Recording and monitoring

- Any and all safeguarding concerns are reported, dated, signed and passed directly to the DSL on campus via EduKey (& CPOMS when introduced).
- If access to Edukey (CPOMS) is not possible, a paper form can be collected from the DSL on each campus. Paper copy must be signed and dated.
- Escalated cases will be formally monitored by the DSL and dDSL of that campus, in accordance with the Procedural Flowchart (Appendix 2). Where required the WSSL is involved into the case.

- If a student transfers from the school, any formal records of concern will be copied for the new establishment (if known), marked confidential and securely forwarded, separate from other files, for the attention of the receiving school's Child Protection Officer. At the discretion of the SGT, any other doubts may be verbally communicated.
- Child abuse cases are applicable to children and juveniles under the age of 18 (UK guideline).
- All formal records will be held at the school.
- When referring cases to the Social Welfare Department (SWD), it is important to include the HKID number for students as this facilitates the registration process with the SWD.

7.12 Report on Safeguarding

- The WSSL will provide a report for each Full Board meeting. It will as a minimum contain:
 - Update analytics of the numbers and types of concerns per year by school and actions taken as appropriate.
 - Any training pertaining to safeguarding since the last report.
 - Updates on community safeguarding awareness since the last report.
 - Any recommendations and reflections.
- Confidentiality - this report is only shared with the SGT, SLT and BoG. Whilst it contains no traceable personal data, due to the subject matter, it is treated with extreme sensitivity.
- Rationale - figures are recorded and reported to analyse the effectiveness of policy and procedure in place.
- In addition to the board reports, the link governor will be invited one per term to one of the safeguarding team meetings.

7.13 Safeguarding guidance for adults working with students

- **Relationship:** Whenever working with Kellett students, remember that you have a professional, not personal, relationship with them. The following guidance offers sensible and practical advice to keep both you and the student safe.
- **Individual Needs:** Please be aware of any specific student needs and ensure that expectations, behaviour and the working environment are adjusted accordingly.
- **Behaviour:** Whilst it is important to reassure students who may be nervous and reliant on your guidance, you should avoid being over-familiar. Use professional and appropriate language at all times and do not engage in 'horseplay' which may cause embarrassment or fear.

- **Intoxication:** Remember that you are responsible for the safety of all students; you should not work with them whilst under the influence of alcohol or other substances.
- **Activities:** Do not engage in activities or suggestions of a sexual nature.
- **Physical Contact:** On some occasions, physical contact with students may be appropriate (e.g. when reassuring them or guiding them in carrying out operations) but this should be kept to a minimum. Always discuss this beforehand, explaining what you are doing and why.
- **Environment:** Where possible, avoid working alone in an isolated or closed environment with a student. Try to keep an open door and not position yourself between the student and an exit route. If unavoidable, ensure that others know where you are and why.
- **Facilities:** Do not share bathroom facilities with students - if separate facilities are not available (offsite venues), spaces should not be used whilst a student is inside.
- **Travel:** In relation to travel, ensure that a third party is aware of the destination and expected arrival time when travelling with students.
- **Accommodation:** Ensure that any overnight accommodation places you apart from students and that you offer appropriate personal privacy. If you need to enter student accommodation for any reason, please knock, state clearly why you are entering and keep the time spent in the room to a minimum.
- **Personal Data:** Do not exchange personal contact details (e.g. phone number, social networking, email address other than school/work email address) or encourage a student to pass on sensitive information such as that which may be found on their HK ID card or Passport.
- **Photography:** We recognise that taking photographs can play an important role in recording events and celebrating success. Photographs of students should not be used without the written permission of their parents. Ensure that any photographic images of students are not kept on personal devices and are transferred to professional equipment at the earliest possible opportunity.

7.14 Concerns about a staff member, supply teacher, volunteer or contractor

This procedure is followed where a member of staff has allegedly done any of the following:

- Behaved in a way that has harmed a child, or may have harmed a child
- Committed a criminal offence against or related to a child
- Behaved in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- The School has a duty of care to their employees. They will provide effective support for any employee facing an allegation and a named contact if they are suspended.

- An allegation of abuse may be made against a teacher or member of staff (including volunteers) if he/she has:
 - behaved in a way that has harmed a child or may have harmed a child.
 - possibly committed a criminal offence against or related to a child.
 - behaved towards a child or children in a way that indicates he or she would pose a risk of harm by working regularly or closely with children.

Initial Considerations

- The Whole School Safeguarding Lead should be informed immediately.
- The Principal and Director of People and Culture should be informed immediately.
- Staff following procedures for dealing with allegations must be aware that they need to be applied objectively and with common sense.
- In cases deemed borderline, informal discussions will be held with the other members of the Safeguarding Team without naming the individual.
- Some cases may well either not meet the criteria set out above at all or may do so without warranting consideration of a police investigation or enquiries by local authority children's services. In these cases, the school's informal disciplinary procedures should be followed to resolve cases quickly and without delay.
- It may be the case that an allegation will be sufficiently serious as to require immediate intervention by external agencies. The members of the Safeguarding Team will then be informed so that, in conjunction with the Whole School Safeguarding Lead, they can consult external agencies, as appropriate.

Initial investigation

- The WSSL will discuss the allegation with the Principal and Board Member Responsible for Safeguarding immediately.
- The purpose of this initial discussion is for the WSSL to consider the nature, content and context of the allegation and agree a course of action. The WSSL may need to provide or obtain additional information which may be relevant, such as previous history, whether the child or their family have made similar allegations and the individual's current contact with children.
- If the allegation is against The Principal, the Chair of the Board of Governors (or designated nominee in his/her absence), would take on the Principal's role in this procedure.

Further Investigation

- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In such a scenario, this decision and a justification for it should be recorded (by both the Whole School Safeguarding Lead and the members of the Safeguarding Team), and agreement reached as to what information should be put in writing to the member of staff concerned (and by whom). The

members of the Safeguarding Team should then consider what action should follow in respect of the member of staff and those who made the initial allegation.

- Where further investigation is deemed necessary, the Principal should inform the member of staff about the allegation as soon as possible after consulting the other members of the Safeguarding Team, providing as much information as permissible. If a strategy discussion is needed however, or external agencies need to be involved, this will not happen until those agencies have agreed what information can be disclosed to the person.
- In some cases, further enquiries will be needed to inform the decision about how to proceed. If so, the members of the Safeguarding Team will discuss with the WSSL, how and by whom the investigation will be undertaken. In straightforward cases the investigation should normally be undertaken by a senior member of the school. However, the nature or complexity of the allegation may require an independent investigator.

Communication with parents

- Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or external agencies need to be involved, the Principal will not do so until those agencies have agreed what information can be disclosed to the parents. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

Suspension

- The Principal will consider carefully whether the circumstances of a case warrant the member of staff being suspended from contact with children at the school until the allegation or concern is resolved. Suspension is not the default position – an individual will only be suspended if there is no reasonable alternative, such as moving to another area of the School or removing them from specific types of duties which have contact with children.
- Where it has been deemed appropriate to suspend the person, written confirmation will be sent within one working day, giving the reasons for the suspension. The person will be informed at that point who their named contact is within the School organisation and provided with their contact details.
- If the allegation is not demonstrably false or unfounded, and there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened in accordance with the procedures of local external agencies.
- If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take account of the fact that teachers and other school staff are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour.
- Where it becomes clear that an investigation by the police or other external agencies is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the members

of the Safeguarding Team will discuss the next steps with the Whole School Safeguarding Lead. The Chair of the Board of Governors will be kept informed. In these circumstances the options depend on the nature and circumstances of the allegation and the evidence and information available and could range from taking no further action to summary dismissal and a decision not to use the person's services in future.

Timescales

- The School recognises that it is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. All allegations will be investigated as a priority so as to avoid any delay. The time taken to investigate and resolve individual cases will depend on a variety of factors including the nature, seriousness and complexity of the allegation, but it is expected that the case should be resolved in one to three months. In truly exceptional cases this may take up to twelve months.
- For those cases where it is clear immediately that the allegation is unfounded or malicious then it is expected that they should be resolved within one week.
- Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the School as the employer to deal with, although if there are concerns about child protection, the WSSL should discuss action with the members of the Safeguarding Team.
- In such cases, if the nature of the allegation does not require formal disciplinary action, the Principal will initiate appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Supporting Staff

- The School will act to manage and minimise the stress inherent in the allegations and disciplinary process.
- The member of staff will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the any external authorities or the police.
- The member of staff will be advised to contact their trade union representative, if they have one, and/or a colleague for support. He/she will also be given access to a senior member of staff as a named contact to provide information regarding the progress of the case and any current work-related issues.
- Social contact with colleagues and friends will not be prevented unless there is an indication that that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Confidentiality

- When an allegation is made the School will make every effort to maintain confidentiality and guard against unwanted publicity while investigations are carried out (in accordance with the School's Data Protection Policy).
- The School will take advice from external agencies to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any, information can be reasonably given to the wider community to reduce speculation and
- How to manage press interest if and when it should arise.

Resignations, Dismissal, Ceasing to provide services, 'Settlement Agreements' and References

- If a member of staff tenders his/her resignation, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with these procedures.
- Ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; not continuing with the employment of a probationer, no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial training, or volunteering.
- Every effort will be made to reach a conclusion in all cases where allegations relating to the safety or welfare of children are concerned.
- Wherever possible the member of staff will be given the opportunity to answer and make representations with regard to the allegation. However, the investigative processes outlined above will continue in cases where this does not happen for whatever reason.
- A 'compromise agreement', by which a person agrees to resign if the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, generally should not be used in these cases. No such agreement will prevent a thorough police investigation or override the statutory duty to make a referral to the Disclosure and Barring Service (DBS), and HK equivalent, where appropriate.
- Cases in which an allegation was proven to be unsubstantiated, unfounded or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in any reference.

Record keeping

- Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on a member of staff's confidential personnel file, and a copy provided to the person concerned.
- The purpose of this record is to enable accurate information to be given in response to any future request for a reference, where appropriate. (It could provide clarification in cases where future DBS Disclosures reveal information from the police about an allegation that did not result in a

criminal conviction, and it could help to prevent unnecessary re-investigation if an allegation re-surfaces after a period of time.)

- The record will be retained on the School Child Protection file for a period of 10 years from the date of leaving the employment of the School.

Action on conclusion of a case

- When any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged. In these circumstances the members of the Safeguarding Team / Principal will discuss with the Chair of the Board of Governors whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or the local authority social care services can inform that decision. The options will depend on the circumstances of the case, and the consideration will need to take account of the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.
- If the allegation is substantiated and the person is dismissed or the School ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the members of the Safeguarding Team should make a referral to the EDB for consideration of inclusion on the barred lists is required.
- In the case of employees from the UK,
 - there is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child or if a person otherwise poses a risk of harm to a child. In such circumstances, the duty to refer an individual to the DBS arises where an employer has removed the individual from relevant work with children or the person has chosen to cease relevant work in circumstances where they would have been removed had they not done so.
 - the School will also make a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had they not resigned) for reasons of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. Referrals will be made as soon as possible after the resignation or removal of the member of staff involved and within one month of ceasing to use the person's services.
- In the case of employees from other countries, the School will inform their relevant safeguarding authorities and teaching professional bodies on the basis of the paragraphs above.
- In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, the School will consider how best to facilitate this, bearing in mind that most people will benefit from some help and support to return to work after a very stressful experience.
- Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The School will also consider

how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the School.

Action in respect of unfounded or malicious allegations

- If an allegation is determined to be unfounded or malicious, In the event that an allegation is shown to have been deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the student who made it.

Learning lessons

- At the conclusion of a case in which an allegation is substantiated the WSSL, the relevant DSL and members of the Safeguarding Team will review the circumstances of the case to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

7.8 Allegations of abuse made against other students

- Kellett School recognises that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".
- We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.
- Most cases of a student hurting other students will be dealt with under our school's behaviour policy, but this procedure will apply to any allegations that raise safeguarding concerns.
- This might include where the alleged behaviour:
 - Is serious, and potentially a criminal offence
 - Could put students in the school at risk
 - Is violent
 - Involves students being forced to use drugs or alcohol.
 - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting).
- If a student makes an allegation of abuse against another student:
 - You must record the allegation and tell the DSL, but do not investigate it.
 - The DSL will contact the social welfare department and follow its advice, as well as the police if the allegation involves a potential criminal offence.
 - The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
 - The DSL will contact any additional mental health professionals if necessary.
- We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images .
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent .
- Ensuring students know they can talk to staff confidentially by referring to the Wellbeing Team.
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

7.9 Reporting systems for our students

- Where there is a safeguarding concern, we will take the child’s wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
- To achieve this, we will:
 - Put systems in place for pupils to confidently report abuse.
 - Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
 - Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

8. Online safety and the use of mobile technology

- We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this:
 - There are robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors.
 - We educate the community in the safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’).
 - We set clear guidelines for the use of mobile phones for the whole school community.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above, we:

- Educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology.
- Keeping personal information private.
- How to recognise unacceptable behaviour online.
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.
- Train staff on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings and dinner discussions. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

8.1 Artificial intelligence (AI)

- Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.
- Kellett recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- Kellett will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.
- Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

9. Notifying parents or carers

- Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the NGO Social Worker or Head of School before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or NGO Social worker or Government SWD to make sure our approach to information sharing is consistent.
- The DSL will:

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

10. Whistleblowing

- All staff, outside providers and voluntary adults have a duty to notify the Principal about child protection concerns regarding the attitude or actions of any adult working with Kellett students.
- All staff, outside providers and voluntary adults have a duty to notify the Principal if they are concerned about the effectiveness of the practices supported within this policy.
- See the School Whistle-blowing Policy.

15. Record-keeping

- All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing and logged in Edukey (CPOMS when operational), Records will include:
 - A clear and comprehensive summary of the concern.
 - Details of how the concern was followed up and resolved.
 - A note of any action taken, decisions reached and the outcome.
- Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
- In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

16. Safer recruitment

See Safer recruitment policy.

17. Monitoring arrangements

This policy will be reviewed annually by WSSL. At every review, it will be approved by the full governing board.

18. Low-level concerns

This section is based on KCSIE Section 2: 'concerns that do not meet the harm threshold'. It aims to:

- Ensure that all concerns about adults can be identified and spoken about openly with the appropriate safeguarding team.
- Ensure that all concerns about adults are recorded and dealt with sensitively and appropriately.
- Create an open and transparent culture which enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working for or with the school are clear about professional boundaries and act within them, in accordance with the ethos and values of the school.
- Help ensure that adults consistently model the school's values and help keep children safe.
- Protect adults working in school from potential false allegations or misunderstandings.

Appropriate and inappropriate behaviour

- A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:
 - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
 - does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Hong Kong authorities.
- Examples of such inappropriate behaviour could include, but are not limited to:
 - being over friendly with children .
 - having favourites - this could include, but is not limited to, calling pupils by pet names or terms of endearment, or buying pupils gifts.
 - taking photographs of children on their mobile phone, contrary to school policy .
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door
 - using inappropriate, sexualised, intimidating or offensive language.
 - humiliating children.
 - engaging with students online and through social media.

This list is not exhaustive or designed to be exclusive.

- Low-level concerns are differentiated from allegations, which should be escalated using the 'Allegations Against Staff' policy. An allegation is where an adult has:
 - behaved in a way that has harmed a child or may have harmed a child and/or
 - possibly committed a criminal offence against, or related to, a child and/or

- behaved towards a child or children in a way that indicates that he or she may pose a risk of harm to children and/or
 - behaved or may have behaved in a way that indicates he or she may not be suitable to work with children.
- While low-level concerns are, by their nature, less serious than allegations, the school understands that many serious safeguarding concerns (e.g. child sexual abuse) often begin with low-level concerns (e.g. subtle grooming by an offender). The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.
 - Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the Hong Kong authorities or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head of School / Principal.
 - The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils. Staff will ensure that they pay due regard to the fact that:
 - they are in a unique position of trust, care, responsibility, authority and influence in relation to pupils and
 - there is a significant power imbalance in the pupil-staff dynamic and
 - there are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.
 - Staff will remain aware of the fact that all pupils regardless of the phase and year group they are at within the school, are considered children – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers.
 - Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Head of school / DSL immediately.
 - Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse.
 - Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors (e.g. the age or needs of the child, or the content of exchanged messages) and that some of the above incidents may not be concerns in context (e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks).
 - Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and

supported to correct this behaviour in line with the school codes of conduct. The Head of school will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole, where low-level concerning behaviour is seen more widely.

The Importance of sharing low-level concerns

- Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe. All concerns, no matter how small they are, must be reported.
- The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.
- The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the school Code of Conduct and will address any questions they have regarding safeguarding the Head of school / DSL.
- The school will work to foster an environment and culture where personal and professional boundaries are clearly set and respected for all individuals in the school community (e.g. pupils are not treated as friends, and an appropriate professional distance is maintained by staff).
- The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Reporting a low-level concern

- Where a low-level concern exists, it should be reported to the DSL. In the absence of the DSL, the concern should be raised with the DDSL/Headteacher.
- Concerns about the Principal must be reported to the Chair of Governors who will inform the WSSL.
- Concerns about a governor must be reported first to the Principal. In the absence of the Principal, the concern should be raised with the WSSL.

Self-reporting

- From time to time an individual may find themselves in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour. Such examples might include when a member of staff:
 - has a child who is a student in the school – they may have the mobile phone number of their child's friend.
 - plays in an external sports team with a current student and they may be on a WhatsApp group with them.
 - is having to drive a student somewhere – for example for an urgent medical appointment.
 - seeing students underage/drinking in a social situation.

Any such individual who wishes to self-report should speak with their school DSL.

- Important note for staff parents. As a staff parent, you are likely to encounter other situations that you would like to self-report, this can include situations such as:
 - having students over for a sleepover as they are friends with your children.
 - taking students in your car as they are friends with your children.
 - regular checking of your child's phone which uncovers concerns about your child's friends
 - becoming aware of underage drinking parties.

Any such individual who wishes to self-report should speak with their school DSL.

Responding to a Low-Level Concern

- Once the Head of school / DSL has received a low-level concern, they will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):
 - speak to the person who raised the concern (unless it has been raised anonymously).
 - speak to any potential witnesses as is deemed appropriate.
 - speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the relevant external agencies, where they have been contacted).
- They will then review the information and determine whether the behaviour:
 - is entirely consistent with their staff code of conduct and the law.
 - constitutes a low-level concern.
 - is not serious enough to consider a referral to the Hong Kong Authorities.
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation.
 - in and of itself meets the threshold of an allegation.
- Where there is in any doubt whatsoever, the Head of school / Principal will always seek advice from the Hong Kong Local Authorities.
- While responding to any incident, the Head of school / DSL will make appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared and any relevant witnesses.
- all external conversations – for example, with the SWD/Police (where they have been contacted)
- their determination.
- the rationale for their decision.
- any action taken.

Possible Outcomes from a Low-Level Concern

- If it is determined that the behaviour is entirely consistent with the school's staff code of conduct and the law, the Head of school will:
 - update the individual in question and inform them of the action taken as above .
 - speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisations staff code of conduct and the law.
 - consider if the situation may indicate that the staff code of conduct or low-level concerns policy is not clear enough, or if further training is required.

- If it is determined that the behaviour constitutes a low-level concern:
 - It will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and, on a need-to-know basis.
 - Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training.
 - In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening. Any such conversation will include being clear with the individual as to why their behavior is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the haviour in question.
 - Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
 - Some low-level concerns may also raise issues of misconduct or poor performance. The Head of school will also consider whether this is the case by referring to the organisation's disciplinary and/or capability policy and taking advice from the school's Director of People and

Culture. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for the director of People and Culture.

- Where a low-level concern relates to a person employed by a supply agency, contractor, that concern will be raised with their employers, so that any potential patterns of inappropriate behaviour can be identified.
- Where school receives a low-level concern or allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the school should follow their safeguarding policies and procedures.

What records will be kept?

- Where a low-level concern has been communicated, a confidential record will be kept in a confidential area within the People and Culture SharePoint site which acts as a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:
 - the concern (or group of concerns) has been reclassified as an allegation.
 - the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability, or disciplinary procedure.
- The Principal will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified.

Retaining Low Level Concerns

- Low-level concerns will be retained on the schools central low-level concerns file unless and until further guidance provides otherwise. When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low Level Concerns and References

- KCSIE prohibits schools from referring to unsubstantiated, malicious or false allegations in references. Only safeguarding allegations that have been substantiated should be included in references. KCSIE states that: "schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same

individual) that meet the harm threshold in references. Low-level concerns should 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.

Unsubstantiated or malicious allegations

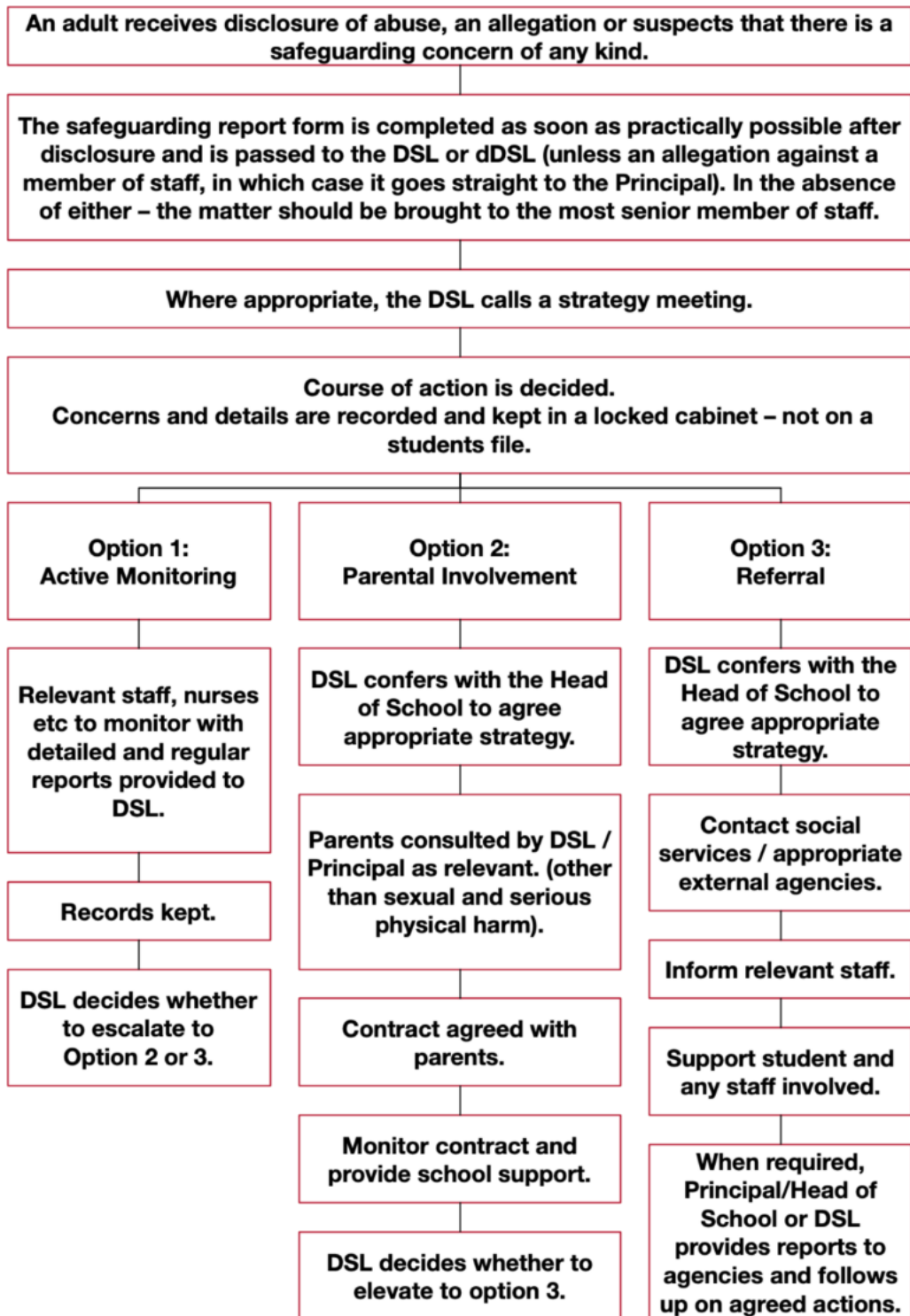
- If an allegation is shown to be deliberately invented, or malicious, the principal, or other appropriate person in the case of an allegation against the principal, will consider whether any disciplinary action is appropriate against the pupil(s)/staff who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate.

APPENDIX 1: SAFEGUARDING TEAM STRUCTURE

For the academic year 2025-26 these are:

Whole School	
Safeguarding Governor	Sabrina Grandolfo
Whole School Safeguarding Lead	Joe Alsop
Consulting Safeguarding Member	Justin McLaughlin
Safeguarding Liaisons	Sylvia Ho
Senior School	
Designated Safeguarding Lead	Hayley Wilson
Deputy Designated Safeguarding Lead	Ed Pegden
Safeguarding Officer Bowen	Sam Hill
Safeguarding Officer Clementi	Chris Deplancke
Safeguarding Officer Maclehose	Georgia Price
Safeguarding Officer Youde	Isi Hosgood
Language liaison	Qi An Chen
KLB Prep	
Designated Safeguarding Lead	Dean Penny
Deputy Designated Safeguarding Lead	Rebecca Findlay
Language liaison	Cecilia Ngan
PFL Prep	
Designated Safeguarding Lead	Hannah Wright
Deputy Designated Safeguarding Lead	Ben Dixon
Deputy Designated Safeguarding Lead	Sam Lehmann

APPENDIX 2: PROCEDURAL FLOWCHART



APPENDIX 2: LOW-LEVEL CONCERNS REPORTING FORM

Person reporting the low level concern
Name
Name of individual/s whom the concern is about
Name
Name
Name
Details of concern Please include as much detail as possible. Think about the following: <ul style="list-style-type: none">• What behaviour and/or incident are you reporting?• What exactly happened?• Why does this incident/behaviour worry you?• Why do you believe the behaviour and/or incident is not consistent with our staff code of conduct?
Details of any children/students involved
Names (s)
Signature

