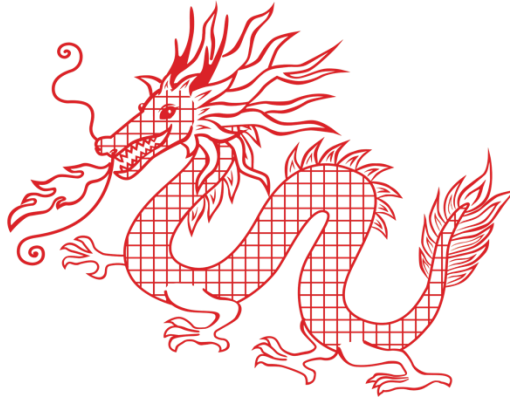


KELLETT SCHOOL HONG KONG

SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

LAST REVIEW DATE	September 2024
Owner	Whole School Safeguarding Lead
Legal Sign-off by:	N/A
Legal Sign-off date:	N/A
Type of Policy:	Board / Exec for Operational Changes
Authorised by Exec:	20/08/2024
Authorised by Board:	September 2024
Circulation:	Website, Staff Intranet, Parent Portal, Board/SMT



KELLETT SCHOOL HONG KONG

SAFEGUARDING POLICY AND PROCEDURES

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1. PURPOSE

- 1.1 The aim of this policy is to outline the steps that Kellett School takes to ensure that it is a school which prioritises safeguarding so that its students flourish. Kellett School aims to provide a safe learning environment where children grow up safely and securely.
- 1.2 This policy establishes how the School ensure that the development and wellbeing of the students and young learners in our care is not adversely affected. This includes, but is not limited to training, support to families and (early) intervention to meet the needs of children and continues through to child protection and referral of abuse.
- 1.3 This policy adheres to and considers the following:
 - 1.3.1 Human Rights Act 1998: 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 schools under the European Convention on Human Rights (ECHR).
 - 1.3.2 Equality Act 2010: governing bodies and proprietors should carefully consider how they're supporting their pupils and students regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race) under the Equality Act.
 - 1.3.3 Public Sector Equality Duty (PSED): you can take positive action to deal with particular disadvantages affecting pupils (where you can show it's proportionate). This includes making reasonable adjustments for disabled pupils.
 - 1.3.4 The children act 1989 (and 2004 amendment) which provides a framework for the care and protection of children.
 - 1.3.5 This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
 - 1.3.6 Any other relevant Hong Kong law equivalent to the UK Laws above.
- 1.4 Under the PSED, you must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps your school to focus on key issues and how to improve student outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic, transphobic bullying or racial discrimination.

2 SCOPE

- 2.1 All employees, contractors, visitors, vendors, parents and students.

3 POLICY

- 3.1 This policy applies to all occasions where students are under the care of Kellett School, both on or off-site and outside of school hours.
- 3.2 All adults working with students are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- 3.3 It is our responsibility to protect and safeguard the welfare of children and young people in its care. We work by the principle that the paramount concern is the welfare of the child.
- 3.4 We recognise that children have the right to be treated with dignity and respect, free from emotional or physical danger, abuse and neglect. Safeguarding children is fundamental to the social, emotional, physical and mental development of the child.
- 3.5 We recognise that 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.
- 3.6 We give special consideration to children who:
 - 3.6.1 Have Additional Support Needs (ASN), disabilities or health conditions
 - 3.6.2 Are young carers.
 - 3.6.3 May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
 - 3.6.4 May have English as an Additional Language (EAL)
 - 3.6.5 Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
 - 3.6.6 Are Asylum seekers / refugee
 - 3.6.7 Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
 - 3.6.8 Are at risk due to either their own or a family member's mental health needs.
 - 3.6.9 Are looked after or previously looked after.

- 3.7 We recognise that students with ASN and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:
- 3.7.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
 - 3.7.2 students being more prone to peer group isolation than other students.
 - 3.7.3 the potential for students with ASN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
 - 3.7.4 communication barriers and difficulties in overcoming these barriers.
- 3.8 We recognise that child-on-child abuse may take place. This policy extends to these cases. We are an agent of referral only and not of investigation and will, when appropriate, draw on the services of external agencies. These may include:
- 3.8.1 Child Abuse Investigation Unit (CAIU).
 - 3.8.2 Family and Child Protective Services Units (FCPSU).
 - 3.8.3 Social Welfare Department outreach team (SWD) .
- 3.9 We recognise that for our students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps to prevent abuse.
- 3.10 We distinguish between "children missing education" and "children absent from education": Children being absent from education for prolonged periods and/or on repeat can act as a warning sign to a range of safeguarding issues. The school's response to persistently absent pupils and children missing education supports identifying any abuse, and in the case of absent pupils, helps prevent the risks of them becoming a child missing education in future.

4 DEFINITIONS

4.1 Safeguarding and promoting the welfare of children means: –

- 4.1.1 Providing help and support to meet the needs of children as soon as problems emerge
- 4.1.2 Protecting children from maltreatment, whether that is within or outside the home, including online
- 4.1.3 Preventing the impairment of children's mental and physical health or development

- 4.1.4 Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- 4.1.5 Taking action to enable all children to have the best outcomes.
- 4.2 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.
- 4.3 Abuse - is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse
- 4.4 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.
- 4.5 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.
- 4.6 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.
- 4.7 Whole School Safeguarding Lead (WSSL) – The appointed person who leads the Safeguarding Team. Further responsibilities are defined in paragraph 5.3.
- 4.8 Designated Safeguarding Lead (DSL) – The appointed person to lead on Safeguarding on their campus. Further responsibilities are defined in paragraph 5.4.
- 4.9 Deputy Designated Safeguarding Lead (dDSL) – The appointed person in case the DSL is unavailable.
- 4.10 Safeguarding Liaison (SL) – Members of staff appointed to bridge cultural/language barriers between the School and local authorities or non-English speaking parents and carers.
- 4.11 Safeguarding Governor (SG) – The member of the Board of Governors (BoG) appointed as a liaison between the Safeguarding Team and the BoG.
- 4.12 Safeguarding Team (SGT) – All persons listed under 4.7 to 4.11

- 4.13 Voluntary Adult (VA) - adults who are supervised in supporting a school-organised activity involving Kellett Students. They are not directly employed by the Kellett School Association.
- 4.14 Outside Providers (OP) - all organisations or individuals contracted to provide or enrich education for Kellett School students.
- 4.15 Safeguarding Officer (SO) – In the Senior school each of the Heads of House are SOs and work alongside the DSL/DDSL just for those students in their House.

5 RESPONSIBILITIES

- 5.1 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.
- 5.2 The Principal ensures the following appointed positions are in place within the Safeguarding Team:
 - 5.2.1 A Whole School Safeguarding Lead (WSSL) is appointed at Head level with a whole school responsibility.
 - 5.2.2 Designated Safeguarding Leads (DSL) are appointed at Deputy Head level on each campus.
 - 5.2.3 Deputy Safeguarding Leads (dDSL) are appointed in the position of School Nurse, Head of Student Wellbeing or Assistant Head.
 - 5.2.4 Safeguarding Liaisons (SL) are appointed in various positions, carrying out a supportive role towards the local community and authorities.
 - 5.2.5 A Safeguarding Governor (SG) is appointed from the Board of Governors.
 - 5.2.6 The Safeguarding Team (SGT) 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.
- 5.3 The Principal is responsible for:
 - 5.3.1 Ensuring compliance to this policy/procedure.
 - 5.3.2 Working alongside the SGT in cases requiring referral to an outside agency.

- 5.3.3 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.
- 5.3.4 Acting upon allegations involving members of staff (as described in paragraph 6.5).
- 5.4 The WSSL is responsible for:
 - 5.4.1 Roles and Responsibilities within the Safeguarding Team.
 - 5.4.2 Ensuring the Team is fully trained and compliant with all Safeguarding procedures.
 - 5.4.3 Organising half-termly meetings of the SGT.
 - 5.4.4 Preparing the biannual report and presenting this report to SMT / BoG.
 - 5.4.5 Ensuring this policy/procedure is reviewed annually.
 - 5.4.6 Ensuring the SGT is properly equipped to carry out its duty.
- 5.5 The DSL on each campus is responsible for:
 - 5.5.1 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.
 - 5.5.2 Informing all staff about safeguarding responsibilities and procedures through annual training, offering support and advice when required.
 - 5.5.3 Ensuring that all adults have access to information on best practice when working with students.
 - 5.5.4 Informing all students about adults in the school that they can approach if they are worried or in difficulty.
 - 5.5.5 Ensuring that students accused of abuse are supported according to this policy.
 - 5.5.6 Keeping records of all safeguarding concerns.
 - 5.5.7 Making the decision as to whether reported safeguarding concerns be escalated to a formal record of concern.
 - 5.5.8 Securely passing information between campuses or schools at times of transition.

- 5.5.9 Requesting information from feeder schools regarding any specific child protection concerns.
 - 5.5.10 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.
 - 5.5.11 If for any reason the DSL is unavailable, a dDSL has been identified who will act in their absence (Appendix 1).
- 5.6 The **Safeguarding Teams (SGT)** is responsible for:
- 5.6.1 To establish and maintain an environment where students feel safe and secure and are encouraged to talk and are listened to.
 - 5.6.2 To inform all adults in our community of best practice with regards to safeguarding children in recognition that safeguarding is a shared responsibility.
 - 5.6.3 To ensure that the procedures for dealing with safeguarding are shared with all staff and that regular training occurs to support best practice.
 - 5.6.4 To ensure that students know that there are adults within the school who they can approach if they are worried or in difficulty.
 - 5.6.5 To ensure that wherever possible every effort will be made to establish effective working relationships throughout our wider community including those from partner agencies.
 - 5.6.6 To identify opportunities and activities within the curriculum which equip students with the skills they need to stay safe from abuse.
 - 5.6.7 Providing support to all members of the Kellett community in regard to Child Protection issues.
- 5.7 The **Senior Management Team (SMT)** is responsible for:
- 5.7.1 ensuring that the school follows safe recruitment processes
 - 5.7.2 Giving final approval to amendments to safeguarding policy as recommended by the SGT.
- 5.8 The **Board of Governors** is responsible for:

- 5.8.1 Acting upon the annual summary provided by the SGT if required.
- 5.8.2 Appointing a designated Safeguarding Governor.
- 5.8.3 Acting upon concerns regarding the Principal's role in Child Protection referral cases.
- 5.8.4 Acting upon allegations involving the Principal.
- 5.8.5 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.
- 5.8.6 Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty (PSED) (paragraph 82), the children act 1989 (and 2004 amendment) and the statutory framework for the Early Years Foundation Stage
- 5.8.7 To ensure that:
 - (a) The designated safeguarding lead (DSL) has the appropriate status and authority to carry out their job. Governing bodies need to give the DSL the additional time, funding, training, resources and support needed to carry out their role effectively.
 - (b) Online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies/procedures (this has now been specified as a responsibility of governing bodies and proprietors).
 - (c) 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.)
 - (d) Your 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).
 - (e) The child protection policy reflects that children with special educational needs or disabilities (SEND), 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).

- (f) 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.

- 5.9 The HR Manager 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.

6 SCHOOL VOLUNTEERS AND VISITORS

6.1 Definitions

6.1.1 School Volunteer

6.1.2 School Visitor

6.2 Check

6.2.1 ID on arrival

6.2.2 Declaration of no criminal – as part of the Visitor Management System.

6.3 Volunteers and Visitors who have unsupervised access to children

6.3.1 Professionals (such Clinical Psychologist etc)

6.3.2 Need pre-checks in advance, and proof of ID on arrival

7 PROCEDURES

7.1 Training and support

Role	Training Required	Timeframe
Any new staff member	Safeguarding Training (Basic)	Induction Period (1 month)
Newly appointed members of the SGT	Safeguarding Training (Advanced)	Within first year
All members of the SGT	Safeguarding Training (Advanced)	Every 2 years
All Kellett employees	Safeguarding Training (Basic)	Every 2 years
	Safeguarding Briefing by SGT	Every 1 year
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 (Basic)	On appointment as Governor

7.2 Confidentiality

- 7.2.1 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.
- 7.2.2 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.
- 7.2.3 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.
- 7.2.4 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.
- 7.2.5 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

7.2.6 If staff are in any doubt about sharing information, they should speak to the WSSL/DSL (or a Deputy)

7.3 Signs or symptoms which may indicate abuse

7.3.1 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.

7.3.2 Signs or symptoms which may indicate neglect:

- a. Hunger
- b. Tiredness or listlessness
- c. Child dirty or unkempt
- d. Consistently poorly or inappropriately clad for the weather
- e. Poor school attendance or often late for school

- f. Poor concentration
- g. Affection demanding or attention seeking behaviour
- h. Untreated or recurring illnesses/injuries
- i. Severe rash or skin diseases
- j. Stealing or scavenging compulsively
- k. Failure to thrive
- l. Failure to develop intellectually or socially

7.3.3 Signs or symptoms which may indicate physical abuse:

- a. Inconsistent or unexplained account of how injuries occurred patterns of bruising
- b. Finger, hand and nail marks, black eyes
- c. Bite marks
- d. Round burn marks, burns and scalds
- e. Lacerations, abrasions, welts
- f. Fractures
- g. Bald patches
- h. Symptoms of drug or alcohol intoxication or poisoning
- i. Unaccountable covering of limbs, even in hot weather
- j. Fear of going home or parents being contacted
- k. Fear of medical help
- l. Fear of changing for PE
- m. Inexplicable fear of adults or overcompliance
- n. Violence or aggression towards others including bullying

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

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

7.3.5 Signs or symptoms which may indicate sexual abuse:

- a. Sexually explicit play or behaviour or age-inappropriate behaviour
- b. Anal or vaginal discharge, soreness or scratching
- c. Difficulty walking or sitting
- d. Pregnancy
- e. An unusual or unexplained period of absence
- f. Truancy, lateness, reluctance to go home

- g. Inability to concentrate, tiredness
- h. Refusal to communicate, elective mute
- i. Thrush or other sexually transmitted infections
- j. Persistent complaints of stomach disorders or pains
- k. Eating disorders, e.g. anorexia nervosa and bulimia
- l. Attention seeking behaviour, self-mutilation, substance abuse
- m. Aggressive behaviour including sexual harassment or molestation
- n. Unusually compliant
- o. Regressive behaviour
- p. Enuresis, soiling
- q. Frequent or open masturbation, touching others inappropriately
- r. Excessive reaction to being touched
- s. Depression, withdrawal, isolation from peer group
- t. Reluctance to undress for PE or swimming
- u. Bruises, scratches, etc., in genital area
- v. Lack of trust in a familiar or particular adult

7.4 Further guidance on definitions of abuse

7.4.1 Domestic abuse:

- a. Children who witness domestic abuse are also victims
- b. Witnessing domestic abuse can have a lasting impact on children
- c. Children can be victims, and perpetrators, in their own relationships too
- d. The abuse can be physical, sexual, financial, psychological or emotional

7.4.2 Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships)

7.4.3 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.

7.5 If a child is in immediate danger

7.5.1 Whilst it is always preferable to inform the DSL first, if you believe the child is in **immediate** danger and you have no time to the DSL, contact the Social Welfare Department / Police. Anyone can make a referral.

7.5.2 Tell the DSL as soon as possible if you make a referral directly.

7.6 Recording and monitoring

7.6.1 Any and all safeguarding concerns are reported, dated, signed and passed directly to the DSL on campus. Staff members will report through the Safeguard My School App by TES EduKey.

a) Where access to Safeguard My School is not possible, a paper form can be collected from the DSL on each campus.

7.6.2 Escalated cases will be formally monitored by the DSL and dDSL of that campus, in accordance with the Procedural Flowchart (Appendix 3). Where required the WSSL is involved into the case.

7.6.3 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.

7.6.4 Child abuse cases are applicable to children and juveniles under the age of 18 (UK guideline).

7.6.5 All formal records will be held at the school.

7.6.6 When referring cases to the Social Welfare Department (SWD), it is important to include the HK ID number for students as this facilitates the registration process with the SWD.

7.7 Safeguarding guidance for adults working with students

- 7.7.1 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.
- 7.7.2 Individual Needs: Please be aware of any specific student needs and ensure that expectations, behaviour and the working environment are adjusted accordingly.
- 7.7.3 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.
- 7.7.4 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.
- 7.7.5 Activities: Do not engage in activities or suggestions of a sexual nature.
- 7.7.6 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.
- 7.7.7 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.
- 7.7.8 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.
- 7.7.9 Travel: In relation to travel, ensure that a third party is aware of the destination and expected arrival time when travelling with students.
- 7.7.10 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.
- 7.7.11 Personal Data: Do not exchange personal contact details (eg. 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.

7.7.12 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.

7.8 Allegations against staff members

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

- a. Behaved in a way that has harmed a child, or may have harmed a child
- b. Committed a criminal offence against or related to a child
- c. Behaved in a way that indicates they may pose a risk of harm to children
- d. Behaved or may have behaved in a way that indicates they may not be suitable to work with children

7.8.2 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.

7.8.3 An allegation of abuse may be made against a teacher or member of staff (including volunteers) if he/she has:

- a. behaved in a way that has harmed a child, or may have harmed a child
- b. possibly committed a criminal offence against or related to a child
- c. 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.

7.8.4 Initial Considerations

- a. The Whole School Safeguarding Lead should be informed immediately.
- b. The Principal and Director of HR should be informed immediately.
- c. Staff following procedures for dealing with allegations must be aware that they need to be applied objectively and with common sense.
- d. In cases deemed borderline, informal discussions will be held with the other members of the Safeguarding Team without naming the individual.

- e. 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.
- f. 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.

7.8.5 Initial investigation

- a. The WSSL will discuss the allegation with the Principal and Board Member Responsible for Safeguarding immediately.
- b. 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.
- c. 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.

7.8.6 Further Investigation

- a. 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.
- b. 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.

- c. 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.

7.8.7 Communication with parents

- a) 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.

7.8.8 Suspension

- a. 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.
- b. 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.
- c. 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.
- d. 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.
- e. 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.

7.8.9 Timescales

- a. 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.
- b. 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.
- c. 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.
- d. 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.
- e. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

7.8.10 Supporting Staff

- a. The School will act to manage and minimise the stress inherent in the allegations and disciplinary process.
- b. 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.
- c. 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.

- d. 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.

7.8.11 Confidentiality

- a. 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).
- b. The School will take advice from external agencies to agree the following:
 - (i) Who needs to know and, importantly, exactly what information can be shared;
 - (ii) How to manage speculation, leaks and gossip;
 - (iii) What, if any, information can be reasonably given to the wider community to reduce speculation and
 - (iv) How to manage press interest if and when it should arise.

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

- a. 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.
- b. 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.
- c. Every effort will be made to reach a conclusion in all cases where allegations relating to the safety or welfare of children are concerned.

- d. 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.
- e. 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), where appropriate.
- f. 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.

7.8.13 Record keeping

- a. 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.
- b. 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.)
- c. 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.

7.8.14 Action on conclusion of a case

- a. 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 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.

- b. 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.
- c. In the case of employees from the UK,
 - I. 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.
 - II. 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.
- d. 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.
- e. 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.
- f. 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.

7.8.15 Action in respect of unfounded or malicious allegations

- a) 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 pupil who made it.

7.8.16 Learning lessons

- a) 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.

7.9 Whistleblowing

7.9.1 All staff, OPs and VAs have a duty to notify the Principal about child protection concerns regarding the attitude or actions of any adult working with Kellett students.

7.9.2 All staff, OPs and VAs have a duty to notify the Principal if they are concerned about the effectiveness of the practices supported within this policy.

7.9.3 See the School Whistle-blowing Policy.

7.10 Safer recruitment

7.10.1 Additional policy guidelines are noted in the Safer Recruitment Policy.

7.11 Advice when dealing with safeguarding disclosures

7.11.1 Remember that abused children often have feelings of powerlessness and betrayal.

7.11.2 If a child approaches you with a safeguarding issue please remember to;

- a) Stay calm and keep an open mind.
- b) Reassure them that they are right to tell, you believe them and their concerns will be taken seriously.
- c) Tell them it is not their fault.

- d) Listen carefully.
- e) Proceed at the child's pace and at a level appropriate to them.
- f) Ask only open questions to clarify facts - tell me, explain, describe.
- g) Explain that you will share this information with another adult at school.
- h) Record what they have said accurately and using their words without your own opinions or comments.
- i) Pass to the DSL as soon as possible.

7.11.3 It is important that you do not;

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

7.11.4 Further consideration around disclosure: children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL)

7.11.5 If staff have a safeguarding concern/allegation about another staff member (including supply staff, volunteers and contractors) that doesn't meet the harm threshold, then they should share it through the appropriate channels by contacting the Director of HR.

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

7.12.1 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”.

7.12.2 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.

7.12.3 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.

7.12.4 This might include where the alleged behaviour:

- a) Is serious, and potentially a criminal offence
- b) Could put students in the school at risk
- c) Is violent
- d) Involves students being forced to use drugs or alcohol
- e) Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

7.12.5 If a student makes an allegation of abuse against another student:

- a) You must record the allegation and tell the DSL, but do not investigate it
- b) 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
- c) 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
- d) The DSL will contact any additional mental health professionals if necessary

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

- a) Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

- b) 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
- c) Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- d) Ensuring students know they can talk to staff confidentially by referring to the Wellbeing Team.
- e) 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

7.13 Sexting

7.13.1 If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

7.13.2 You must not:

- a) 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
- b) Delete the imagery or ask the student to delete it
- c) Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- d) Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- e) Say or do anything to blame or shame any young people involved

7.13.3 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.

7.13.4 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:

- a) Whether there is an immediate risk to student(s)
- b) If a referral needs to be made to the police and/or social welfare department

- c) If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
 - d) What further information is required to decide on the best response
 - e) Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
 - f) Whether immediate action should be taken to delete or remove images from devices or online services
 - g) Any relevant facts about the students involved which would influence risk assessment
 - h) If there is a need to contact another school, college, setting or individual
 - i) Whether to contact parents or carers of the students involved (in most cases parents should be involved)
- 7.13.5 The DSL will make an immediate referral to police and/or social welfare department if:
- a) The incident involves an adult
 - b) 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)
 - c) 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
 - d) The imagery involves sexual acts and any student in the imagery is under 13 (based on UK law)
 - e) 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)
 - f) 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.

7.13.6 Further review by the DSL

- a) 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.
- b) They will hold interviews with the student(s) involved (if appropriate) to establish the facts and assess the risks.
- c) 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.

7.13.7 Informing parents

- a) 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.

7.13.8 Recording incidents

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

7.14 Home Learning

- a) 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.
- b) Where staff are interacting with children online, they will continue to follow our existing staff behaviour policy and IT acceptable use policy. See paragraph 6.4 for adult guidance.
- c) 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 as set out in paragraph 6.3.
- d) 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.
- e) It is the responsibility of the DSL on each campus to make sure parents and carers:

- i. Are aware of the potential risks to children online and the importance of staying safe online
 - ii. 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
 - iii. 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
 - iv. Know where else they can go for support to keep their children safe online
- f) 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.
- g) When Prep and Senior School staff need to have individual one-to-one video sessions with students, the following applies:
- i. One-to-one sessions with students follow the same guidance as one-to-one conversations in school.
 - ii. 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.
 - iii. 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.
 - iv. These recorded videos are kept for 14 days after which they are deleted.
 - v. These individual recordings are logged in a centralised register. Each department is responsible for its own register.

7.15 Annual Report on Safeguarding

7.15.1 The Annual Report on Safeguarding written by the WSSL contains at the least:

- a. Figures on reporting and actions taken.
- b. Recommendations and reflections from the SGT on current policy and procedure.
- c. Any implemented policy changes.

7.15.2 Confidentiality: This report is only shared with the SGT, SMT and BoG. Whilst it contains no traceable personal data, due to the subject matter, it is treated with extreme sensitivity.

7.15.3 Rationale: Figures are recorded and reported to analyse the effectiveness of policy and procedure in place.

7.16 Filtering and Monitoring:

7.16.1 The DSL takes responsibility for understanding the filtering and monitoring systems and processes in place as part of their role.

7.16.2 All staff are to understand the expectations, roles and responsibilities around filtering and monitoring as part of their safeguarding training. If there is any ambiguity around this topic, staff are to speak to their on-campus DSL for clarification.

7.16.3 The school employs a third-party provider to ensure that the school network is safe for students, and this includes the use of filtering and monitoring.

8 REVISION HISTORY

Date	Revision Number	Revision	Reference Sections
2020-11-28	A	Initial transfer from Google to Word using new policy template. Therefore the versioning is reset to 1. Reorganisation of information into new chapter division and revised wording. Additions: ISAMS mention, Home Learning procedures, staff allegation procedures, procedure around Biannual Reporting.	6.3, 6.5, 6.13, 6.14
2021-02-05	B	Updated purpose statement. Added additional home learning guidance for prep schools. Moved responsibility for feeder school information from Admissions to DSL Updated Flowchart	1.0, 6.1, 6.13, 5.11.1 moved to 5.4.9
2021-06-25	C	Alignment of the Prep and Senior in the recording of one-to-one zoom calls. Addition of clause on using HK ID when referring to the SWD Additional clause cross referencing to the Whistleblowing policy	6.13.g 6.4.6. 6.7.3
2021-08-25	D	Added reference to online reporting platform Updated DSL & dDSL register for 2021-22 Removed outdated reporting form	6.4 Appendix 1 Appendix 2
2022-06-15	E	Added new sections further defining abuse in line with KCSIE 2022-2023. Updated terminology in line with updated KCSIE.	
2023-06-23	F	Updated sections to be in line with KCSIE 2023-24. Updated staffing to reflect changes in the Safeguarding Team.	

11/09/23	G	<p>7.15.3 wording changed. When we gave a policy that specifically refers to monitoring and filtering, we can reference the policy.</p> <p>7.7.14 Cii - Changed to TRA from National College for Teaching and Leadership which ceased in 2018</p> <p>Update Appendix 1 with new names</p>	
15/02/24	F	Updated SG Governors	
27/08/24	G	<p>Inclusion of The children Act 1989 (2004 amen) and meeeting EYFS Framework</p> <p>Update safeguarding definition in section 4</p> <p>More detail in section on confidentialit</p> <p>Included HR director</p> <p>‘Avoid’ changed to ‘Do not share’ bathroom facilities</p> <p>Added section on if a child is in immediate danger</p> <p>Added to the section on confidentiality</p> <p>Updated staffing in Appendix 1</p>	<p>1.34</p> <p>4</p> <p>7.2</p> <p>8.7.4b</p> <p>8.8.8</p> <p>7.5</p> <p>8.2.5/8.2.6</p> <p>Appendix 1</p>

APPENDIX 1: THE SAFEGUARDING TEAM

For the academic year 2024-25 these are:

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

APPENDIX 2: PROCEDURAL FLOWCHART

