



# PEMBROKE HOUSE



## SAFEGUARDING & CHILD PROTECTION POLICY

A WHOLE SCHOOL POLICY INCLUDING THE EYFS



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### 1. Introduction

At Pembroke House School (“the school”) we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide an environment in which all children feel safe, secure, valued, respected and confident to talk if they are worried, believing they will be effectively listened to.

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

- Maintaining children’s welfare is our paramount concern, in line with ‘Every Child Matters’.
- Providing an environment in which children feel safe, secure, valued and respected, confident to talk openly and sure of being listened to.
- Providing an environment where the child’s wishes and feelings are taken into account.
- Providing suitable support and guidance so that children have a range of appropriate adults whom they feel confident to approach if they are having difficulties.
- Using the curriculum to provide opportunities for increasing self-awareness, self-esteem, assertiveness and decision-making so that students have a range of contacts and strategies to ensure their protection and understand the importance of protecting others.
- Working with parents to build an understanding of the school’s responsibility to ensure the welfare of all children, including the need for referral to other agencies in some situations.
- Ensuring all staff receive up-to-date training and support can recognise the signs and symptoms of abuse and are aware of the school’s procedures and lines of communication.
- Monitoring children who have been identified as “in need”, including the need for protection; keeping confidential records which are stored securely and shared appropriately with other professionals
- Developing effective and supportive liaisons with other agencies

This policy has been developed following the principles established by the latest Children’s Acts and related guidance. This includes ‘Keeping Children Safe in Education’, ‘Working Together to Safeguard Children’, ‘The Prevent Duty’ ‘What to do if you’re worried that your child is being abused’ and ‘Safety Standards Manual for Schools in Kenya.’ The UN Convention on the Rights of the Child sets out key principles which are enshrined within these acts and statutory guidance.



## 2. Key Personnel

### Key Personnel

**The Designated Safeguarding Lead is:** Evonne Wheeler  
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**The Deputy Designated Safeguarding Lead:** Kaila Millar  
email: [kailamillar@pembrokehouse.sc.ke](mailto:kailamillar@pembrokehouse.sc.ke), Telephone: 0725875601

**The Designated Safeguarding Lead for EYFS is:** Tiva Arkle  
email: [tivaarkle@pembrokehouse.sc.ke](mailto:tivaarkle@pembrokehouse.sc.ke), Telephone: 0721568257

**The Head is:** Deborah Boyd - Moss  
email: [headmistress@pembrokehouse.sc.ke](mailto:headmistress@pembrokehouse.sc.ke), Telephone: 0720602483

**The nominated Safeguarding member of the council is:** Graham Kayes  
email: [councilsafeguardinglead@pembrokehouse.sc.ke](mailto:councilsafeguardinglead@pembrokehouse.sc.ke), Telephone: 0113597776

**The Chair of the Council is:** Thomas Wright  
email: [thomas.council@pembrokehouse.sc.ke](mailto:thomas.council@pembrokehouse.sc.ke), Telephone: 0722205033

## 3. Key Terminology

- **Safeguarding** and promoting the welfare of children is defined as:
  - protecting children from maltreatment;
  - 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; and
  - taking action to enable all children to have the best outcomes.
- **Child protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
- **Staff** refers to all those working on behalf of the school, full or part-time, temporary or permanent, in either paid or unpaid or voluntary capacity.
- **A Child** includes everyone under the age of 18.
- **Parents** refer to birth parents and other adults who are in a parenting role, for example, step-parents, foster carers and adoptive parents.



### 4. Policy Aims

The purpose of this policy is to: -

- demonstrate the school's commitment to safeguarding and child protection to pupils, parents and other partners.
- support the child's development in ways that will foster security, confidence and independence.
- provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
- emphasise the need for good levels of communication between all members of staff.
- develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- develop and promote effective working relationships with other agencies.
- ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a single central record is kept for audit.
- ensure that the school does not knowingly employ people to work in childcare or allow them to be directly concerned in its management if they or others who live or work in their households are 'disqualified' from working with children under the age of 8 under the Childcare Act 2006. This applies not only to 'staff' but also to others such as volunteers and supply/agency staff.

### 5. Policy Principles

- The welfare of the child is paramount
- All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal protection rights, safeguarding and opportunities.
- We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. Pupils and staff involved in child protection issues will receive appropriate support.



### 6. Policy Values

#### 6.1. Supporting Children

- We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm and that Pembroke House is often seen as a child's 'safe place'.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Our school will support all children by:
  - encouraging self-esteem and self-assertiveness, through the curriculum (particularly but not solely through Personal, Social, and Health Education lessons) as well as our relationships, whilst not condoning aggression or bullying.
  - promoting a caring, safe and positive environment within the school.
  - responding sympathetically to any requests for time out to deal with distress and anxiety.
  - offering counselling or other avenues of external support.
  - liaising and working together with all other support services and those agencies involved in the safeguarding of children.
  - notifying external agencies, where appropriate, as soon as there is a significant concern.
  - providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school's medical records are forwarded as a matter of priority.
- Children are taught to understand Safeguarding and to manage risk through our personal, social, health and economic education (PSHE), Relationship and Sex Education and all aspects of school life. This includes online safety.
- Children throughout the school, including EYFS, are taught the importance of keeping safe. The school aims to teach pupils to understand what is acceptable behaviour and to speak up if they believe they or others are not being treated appropriately.

#### 6.2. Prevention / Protection

- We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- The school community will therefore:



- work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- include regular consultation with children, e.g. through weekly Tutor time and Form time.
- ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty, usually the Tutor in the first instance, with the Head of Seniors, Middles, Juniors and Pre-Prep and the School Counsellor also available.
- include safeguarding (including online safety) across the curriculum, including PSHE, and opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.
- ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- Use STEER Tracking to identify children at risk.

### 6.3. Safe School / Safe Staff

We will ensure that:

- All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, staff behaviour policy, safeguarding & child protection policy, the role and names of the Designated Safeguarding Lead and their deputy(ies), and Keeping Children Safe in Education part 1.
- All staff receive safeguarding and child protection training regularly, which is regularly updated and receive safeguarding and child protection updates.
- All nannies attending Pre-Prep have a full police check.
- All staff and governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse;
- The safeguarding & child protection policy is made available via the school website and parents/carers are made aware of this policy and their entitlement to have a copy via the school prospectus and website. All parents/carers are made aware of the responsibilities of staff members regarding child protection procedures through the publication of the Child Protection Safeguarding Policy and reference to it in the school's prospectus.
- The names of the Designated Safeguarding Lead and deputy(ies) are advertised in this document and during staff training, along with an explanation of the school's role in referring and monitoring cases of suspected abuse.
- All staff will be sent the latest copy of **Part 1 of Keeping Children Safe in Education** and will sign to say they have read and understood it.

## 7. Roles and Responsibilities





### 7.1. School

The school is responsible for ensuring that all actions taken are in line with its procedure for safeguarding children. The child protection process is now incorporated within a comprehensive policy and procedure for all children in need.

The role of the school within this procedure is to contribute to the identification, referral and assessment of children in need, including children who may have suffered, are suffering, or who are at risk of suffering significant harm. The school may also have a role in the provision of services to children in need and their families.

All council members and staff, including peripatetic, domestic and ground staff in school, have a role to play concerning:

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

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

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

### 7.2. The Head

The Head will ensure that:

- The Safeguarding and Child Protection policy is in place and implemented by all staff.
- Sufficient time, training, support, and resources, including cover arrangements where necessary, are allocated to the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead to carry out their roles effectively.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Systems are in place for children to express their views and give feedback, which operates with the best interest of the child at heart.
- All staff feel able to raise concerns about poor or unsafe practices and that such concerns are handled sensitively and following the whistleblowing procedures.
- Pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

### 7.3. Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is responsible for (as detailed in Annex C in KCSIE):



- Holding ultimate responsibility for safeguarding and child protection in the school;
- Acts as a source of support and expertise in carrying out safeguarding duties for the whole school community;
- Encourages a culture of listening to children and accounting for their wishes and feelings;
- Is appropriately trained and will refresh their training every two years;
- Liaising with other agencies when necessary;
- Ensuring that locally established procedures are followed, including reporting and referral processes;
- Will keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child, even if there is no need to make a referral;
- Will ensure that all records are kept confidential, stored securely and separate from pupils' records, until the child's 25th birthday;
- Acting as a consultant for staff to discuss concerns;
- Making referrals as necessary;
- Transferring records when a child changes school.
- Representing or ensuring the school is appropriately represented at inter-agency meetings, in particular, Child Protection Conferences;
- Managing and monitoring the school's part in child care;
- Organising training for all school staff;
- Liaising with other professionals;
- Will ensure that all staff sign to say they have read, understood and agree to work within the School's Safeguarding & Child Protection policy, and staff behaviour policy, and ensure that policies are used appropriately;
- Will ensure that the names of the designated members of staff for child protection, the Designated Safeguarding lead and deputies are known among the staff at Pembroke House;
- Informing the designated Safeguarding Council Member of any allegations of child abuse.

The Deputy Designated Safeguarding Lead will assist the DSL in fulfilling these responsibilities.

#### **7.4. Council**

The Designated Member of Council for Safeguarding & Child Protection will ensure:

- There is a Child Protection and Safeguarding policy, together with a staff behaviour policy (staff handbook and code of conduct).
- Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with statutory requirements, are reviewed annually, and the Safeguarding & Child Protection policy is publicly available on the school website or by other means;
- Ensures that all staff, including temporary staff and volunteers, are provided with the school's child protection policy and staff behaviour policy;



- All staff have read the current Keeping Children Safe in Education part 1 and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- The school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and the childcare disqualification regulations and ensures that there is at least one person on every recruitment panel who has completed safer recruitment training.
- The school has procedures for dealing with allegations of abuse against staff (including the Head), volunteers and other children and a referral is made to the DBS and the Teaching Regulation Agency (TRA) if a person in a regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- A member of the Senior Leadership Team has been appointed as the Designated Safeguarding Lead (DSL) by the School Council who will take lead responsibility for safeguarding and child protection and the role is explicit in the role holder's job description;
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social health education (PSHE);
- Appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- Appropriate online filtering and monitoring systems are in place.
- Any weaknesses in Child Protection are remedied immediately.

### 7.5. Parents

Pembroke House will always undertake to share our concerns with and support parents/guardians but the school is required to take into account the safety of individual pupils. Professional advice would be sought before contacting parents, should the need arise.

## 8. Confidentiality

- Pembroke House School recognises that to effectively meet a child's needs, safeguard their welfare and protect them from harm, the school must contribute to inter-agency working in line with Working Together to Safeguard Children and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children and that the Kenya Data Protection Act 2019, the UK Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information to keep children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children.



- All staff must be aware that they cannot promise a child that they will keep secrets which might compromise the child's safety or well-being.
- However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect, they are confidential and the Head or DSL will only disclose information about a child to other members of staff on a need-to-know basis.

### 9. General Safeguarding Strategies

At Pembroke House, we have implemented strategies to address safeguarding issues. These include:

- Health and Safety Policy and Procedures
- Risk Assessment Policy and Procedures
- Safer Recruitment Policy and Procedures
- PSHE/RSE Policy
- Care/Educational Plans
- Strong Home/School Links
- Year 8 Prefect Meetings/Dorm Prefects meetings/Tutor meetings
- Complaints Procedures
- Anti-Bullying Policy
- Good role modelling from staff
- All children are encouraged to take on responsibilities and roles to ensure the safekeeping of themselves and each other.
- All children are taken seriously and their opinions are respected - this promotes trust.
- Weekly pastoral meetings to highlight any specific safeguarding issues with the key safeguarding personnel.
- Termly STEER Tracking questionnaires are completed by students which flag concerns to Tutors and the Pastoral team.

### 10. Child Protection Procedures

#### 10.1. Recognition and categories of abuse

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, with the impact on children of all forms of domestic abuse. Children may be abused in the family or an institutional or community setting by those known to them or, more rarely, by others (e.g. via the Internet). They may be abused by an adult or adults or another child or children. All staff in the school have been made aware of the definitions, signs and symptoms of abuse.



There are four categories of abuse. These are:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

There are also several specific safeguarding concerns that we recognise our pupils may experience:-

- child missing from education
- child missing from home or care
- child sexual exploitation (CSE)
- bullying including cyberbullying
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- child on child abuse
- private fostering
- radicalisation
- serious violence
- teenage relationship abuse
- trafficking
- Youth-produced sexual imagery (sexting)

### **10.2. Responding to Concerns**

- Concerns for a child may come to the attention of staff in a variety of ways, for example through observation of behaviour or injuries or disclosure.
- Any member of staff who has a concern for a child or young person, however insignificant this might appear to be, should discuss this with the Designated Safeguarding Lead as soon as is practically possible but within 24 hours.
- More serious concerns must be reported immediately (within 10 minutes) to ensure that any intervention necessary to protect the child is accessed as early as possible.



- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitates communication.
- If a child discloses abuse to a member of staff then the member of staff should:
  - Allow the child or young person to disclose at their own pace and in their own way.
  - Avoid interrupting except to clarify what the child is saying (attentive listening/reflective feedback).
  - Do not ask leading questions or probe for information that the child or young person does not volunteer.
  - Reassure the child or young person that they have been heard and explain what you will do next and to whom you will talk.
  - Do not promise confidentiality as you may have to break this promise at a later date.
  - Record the conversation as soon as possible. The best practice is to wait until the end of the disclosure and immediately write up a thorough report.
  - Inform the Designated Safeguarding Lead.

### 10.3. Record Keeping

- Staff can play a vital role in helping children in need or at risk through effective record keeping. Any incident or behavioural change in a child that gives cause for concern should be recorded confidentially on an Incident Report (available on the MIS).
- Any incident that is not deemed to be confidential or of little significance is filed in the child's personal Daybook.
- If the incident is confidential or of a child protection matter, it must be sent to the Designated Safeguarding Lead and filed in the confidential Child Protection files. Records must be factual and comprehensive and reflect the words used by the child or young person.
- Opinions should not be given unless there is some form of evidence base which can also be quoted. Records must be signed and dated with timings if appropriate. It is important to remember that any issues are confidential and other staff should be informed only on a '*need to know*' basis.

### 10.4. The Information to be recorded:

- Child's name and year group.



- Child in a normal context, e.g. behaviour, attitude (has there been an extreme change?).
- The incident(s) which give rise to concern with date(s), day(s), times(s) and location(s).
- A verbatim record of what the child or young person has said.
- If recording bruising/injuries, indicate position, colour, size, shape and time on the body map.
- Details of how the concern was followed up and resolved.
- Action was taken, decisions reached and the outcome.

**The details above are vital to the information-gathering process and do not constitute an investigation.**

Written information should be passed to the Designated Safeguarding Lead. The Head should always be kept informed of any significant issues.

### **10.5. Storage of records**

The Designated Safeguarding Lead will ensure that records relating to concerns for the welfare or safety of children are kept separate from other school files and are stored securely. Information will be shared on a strictly need-to-know basis and in line with Child Protection Policy guidance. (See the Data Protection Policy for other information on keeping records on pupils and staff, e.g. taking, storing and using images of pupils).

### **10.6. Referrals to Local Authority - The Children's Offices**

In Kenya, the Local Authority Children's Social Care (known as The Children's Offices) are not as developed as they might be elsewhere. There is a committee now in place to support all schools with Social Care issues. The Child Protection Advocacy Network (CPAN) group has a Multidisciplinary Team made up of representatives from many schools and trained professionals on hand to advise on any issues that may arise. A list of the CPAN consultants is available with the Designated Safeguarding Lead.

## **11. Children Subject to a Child Protection Plan**

Should a child at Pembroke House need protection then the Designated Safeguarding Lead will inform staff who have direct pastoral responsibility for that child. Such a child would be monitored closely and the smallest concern would be recorded and the information passed on to the Designated Safeguarding Lead.

## **12. Particularly vulnerable children**



Pembroke House School recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury, might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture.

In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it. Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are;

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic abuse or parental mental health needs
- living away from home
- vulnerable to being bullied or engaging in bullying
- already viewed as a 'problem'
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation
- at risk of forced marriage
- at risk of being drawn into extremism
- suffering from certain health conditions
- requiring a mental health need
- associated with county lines
- persistently absent from education.

### 13. Anti-Bullying/Cyberbullying





Our school policy on anti-bullying and anti-cyberbullying is set out in the Anti-Bullying Policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

This includes all forms, e.g. cyber, racist, homophobic and gender-related bullying. We keep a record of known bullying incidents, which is shared with and analysed by the governing body.

All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Head and the Designated Safeguarding Lead will consider implementing child protection procedures. PSHE lessons at Pembroke regularly provide opportunities for children to understand that bullying is wrong, its impact and how to deal with it.

### 14. Racist Incidents

Pembroke House does not tolerate racism in any shape or form. Any suspected racist incident will be dealt with quickly in line with the school's Anti-Bullying Policy. Repeated racist incidents or a single serious incident may lead to consideration under child protection procedures and will be recorded using an Incident Report Form on the MIS.

### 15. Radicalisation and Extremism

The Prevent Duty for England and Wales (2021) places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

- Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of armed forces, whether in the United Kingdom or overseas.
- Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.
- Pembroke House School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.
- Pembroke House School seeks to protect children and young people against the messages of all violent extremism, including, but not restricted to, those linked to Islamist ideology, or too Far Right / Neo Nazi / White Supremacist ideology, Irish



Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

- School staff receive training to help identify early signs of radicalisation and extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture.
- The School Council, the Head and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessments may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community, and philosophy.
- When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding Lead. They should then follow normal safeguarding procedures. If the matter is urgent, then the Designated Safeguarding Lead will contact the Kenyan Police.

### 16. Domestic Abuse

Domestic abuse represents one-quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, or mental or physical ability. Domestic abuse can also involve other types of abuse.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Staff should be alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

### 17. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. CSE and CCE occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This can happen online and offline and all staff should be aware of the link between online safety and vulnerability to CSE and CCE.

Any concerns that a child is being or is at risk of being exploited should be passed without delay to the Designated Safeguarding Lead.



Pembroke House School is aware that there is a clear link between regular school absence/truancy and CSE and CCE. Staff should consider a child to be at potential risk in the case of regular school absence/truancy and make reasonable enquiries with the child and parents to assess this risk.

Pembroke House School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Pembroke House School includes the risks of sexual exploitation in the PSHE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk concerning CSE and CCE, including online, and knowing how and where to get help.

### 18. Female Genital Mutilation

Female Genital Mutilation (FGM) is sometimes called female circumcision and refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons.

At Pembroke House School, we believe that all our pupils should be kept safe from harm. Female Genital Mutilation affects girls, particularly from African countries, including Egypt, Sudan, Somalia, Ethiopia, Nigeria, Tanzania, Uganda and Kenya. It is illegal in Kenya and the United Kingdom to allow girls to undergo female genital mutilation either in this country or abroad. People guilty of allowing FGM to take place are punished by fines and imprisonment.

At Pembroke House School we must report concerns we have about girls at risk of FGM to the police and social services.

#### **Key Points:**

- Not a religious practice
- Occurs mostly in girls aged from 5 to 8 years old; but up to around 15
- Criminal offence in the UK since 1985
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison

#### **Reasons for this cultural practice include:**

- Cultural identity – An initiation into womanhood

**Reviewed: September 2025 - BCH, EAW**

**Next Review: August/September 2026**



- Gender Identity – Moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – un mutilated women are regarded as unclean

### **Post-FGM Symptoms include:**

- difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear

### **Longer Term problems include:**

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure
- cysts and abscesses
- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

## **19. Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. School staff should never attempt to intervene directly as a school or through a third party.

## **20. Honour-Based Violence**



Honour-based violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour-based violence might be committed against people who: -

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

### 21. Child on Child Abuse

In most instances, the conduct of pupils towards each other will be covered by our Behaviour Policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Pembroke House School recognises that children are capable of abusing other children and that it can happen here. It will not be passed off as ‘banter’ or ‘part of growing up’.

The forms of child-on-child abuse are most likely to include but not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm
- sexual violence
- sexual harassment
- sexual activity without consent
- intimate personal relationships between peers
- up skirting
- sexting (also known as youth-produced sexual imagery); and
- initiation/hazing type violence and rituals.

The term child on child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. Different gender issues can be prevalent when dealing with child-on-child abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing-type violence).



Pembroke House School aims to reduce the likelihood of child on child abuse through;

- the established ethos of respect, friendship, courtesy and kindness
- high expectations of behaviour
- clear consequences for unacceptable behaviour
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, Pembroke House School will also educate pupils on how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures or allegations of child or child abuse in any form should be referred to the Designated Safeguarding Lead using Pembroke House School's child protection safeguarding procedures as set out in this policy. If a pupil's behaviour negatively impacts the safety and welfare of other pupils, then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.

## 22. Youth-produced sexual imagery (sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth-produced sexual imagery refers to both images and videos where;

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 has sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance '*Sexting in schools and colleges: responding to incidents and safeguarding young people*'. Cases where sexual imagery of people under 18 has been



shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly. If a member of staff becomes aware of an incident involving youth-produced sexual imagery they should follow the child protection procedures and refer to the Designated Safeguarding Lead as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth-produced sexual imagery.

The Designated Safeguarding Lead should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

### 23. Mental Health

All staff should also be aware that 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, they should speak to the designated safeguarding lead or a deputy immediately.

### 24. Concerns Involving Members of Staff

Any concerns that involve allegations against a member of staff should be referred immediately to the Head who will inform the DSL and discuss and agree further action to be taken in respect of the child and the member of staff.

**All staff need to be aware that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. When in doubt, consult.**

There is a requirement to report to the UK Disclosure and Barring Service and the TRA, within one month of leaving the school, any person (whether employed, contracted, a





volunteer, or student) whose services are no longer used because he or she is considered unsuitable to work with children in Kenya.

### 25. Low-level concerns

The School aims to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. The school aims to create a culture in which all concerns about adults are shared responsibly, then recorded and dealt with appropriately. This should:

- enable the school to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and per the ethos and values of the school.

#### **What is a low-level concern?**

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the school or college may have acted in a way that:

- 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 Children’s Office

Examples of such behaviour could include, but are not limited to:

- being over-friendly with children
- having favourites
- taking photographs of children on their mobile phones, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

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

Low-level concerns may arise in several ways and from several sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

#### **Sharing low-level concerns**

All low-level concerns must be shared responsibly with the Designated Safeguarding Lead or Head and recorded in writing promptly.





Staff are encouraged and should feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection, they believe they have behaved in such a way that they consider falls below the expected professional standards.

### **Recording low-level concerns**

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible.

Records will be kept confidential, held securely and comply with the Data Protection Act.

Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the Children's Office. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Records will be retained at least until the individual leaves their employment at Pembroke House. Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

### **Responding to low-level concerns**

Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings.

Any inappropriate behaviour will be addressed by the Head or DSL at the earliest stage to prevent escalation or future harm.

## **26. Supervision and Support**

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the Designated Safeguarding Lead.



- All Early Career Teachers and classroom assistants have a mentor or appraiser with whom they can discuss concerns, including the area of child protection.
- The Designated Safeguarding Lead can put staff and parents in touch with outside agencies for professional support if they so wish.

### 27. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practices and potential failures in the school's safeguarding arrangements. For further information, please refer to the Whistleblowing Policy.

If any staff have any concerns, they can report these to any member of the Safeguarding Team. Whistleblowing regarding the Head should be made to the Chairman of the Council, whose contact details are readily available to staff.

### 28. Policy Monitoring Arrangements

A copy of this policy will be available on the school website, SAT drive and in the Staff Room.

The policy forms part of our school development plan and will be reviewed annually by the Council Member responsible for Safeguarding. The review takes the form of a visit to the school to meet with the Designated Safeguarding Lead and Deputy Safeguarding Lead(s), ensuring the Head is informed of any new developments. Such a visit involves the scrutiny of any documentation relating to Safeguarding and follow-up discussions with the staff.

Should any deficiencies or weaknesses in our policy be highlighted at any time, an immediate review will take place by the Designated Safeguarding Lead and the Designated Council Member in liaison with the Head. Should a revised procedure be necessary it will be issued and implemented with immediate effect.

**All staff have access to this policy and have signed to the effect that they have read and understood its content.**

### ADDITIONAL INFORMATION

**Keeping Children Safe in Education - Further information**



Annex B of the current KCSIE contains important additional information about specific forms of abuse and safeguarding issues. School leaders and staff who work directly with children should read this Annex which includes the following:

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