



The Banda School

SAFEGUARDING & CHILD PROTECTION POLICY



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1. Statement of Intent

The Banda is committed to creating a safe and caring environment for all its pupils regardless of race, ethnicity, religion, sexual orientation or social background. In our family atmosphere, caring, respect, good manners and fair play are high on our list of priorities ensuring that all pupils can develop their full potential and feel positive and confident about themselves. The Banda School endeavors to create a culture of vigilance and will always work in the best interests of the child.

The Banda School also fully recognises its responsibilities towards the Constitution of Kenya 2010. Key components of the constitution regarding child protection are:

Art 29. Every person has the right to freedom and security of the person, which includes the right not to be:

- (c) subjected to any form of violence from either public or private sources;
- (d) subjected to torture in any manner, whether physical or psychological;
- (e) subjected to corporal punishment; or
- (f) treated or punished in a cruel, inhuman or degrading manner.

Art 53. (1) Every child has the right:

(d) to be protected from abuse, neglect, harmful cultural practices, all forms of violence, inhuman treatment and punishment, and hazardous or exploitative labour;

The Banda School also fully recognises its responsibilities towards the Children's Act (2022). Under this Act, a child is entitled to protection from physical and psychological abuse, neglect and any other form of exploitation including sale, trafficking or abduction by any person. Under the Penal Code any person who unlawfully assaults another is guilty of a misdemeanour and is liable to imprisonment. The Basic Education Act, 2013 prohibits physical punishment and mental harassment to the child

This policy applies to all pupils in the school, including Pegasus Early Years. The Board of Governors agrees with this policy and accepts its ultimate responsibility in monitoring compliance.

The following documentation has been consulted in the compilation of this policy:

Kenyan law:

- The Constitution of Kenya 2010
- Children's Act (2022)
- The Penal Code
- The Basic Education Act (2013)

UK guidance:

- Keeping Children Safe in Education (updated September 2026)
- Disqualification under the Childcare Act 2006 (February 2015)
- What to do if you're worried a child is being abused (March 2015)
- Working Together to Safeguard Children (2026)
- Prevent Duty Guidance: for England and Wales (July 2019)
- The Prevent Duty – Departmental advice for schools and childminders (June 2015)
- Teaching Online Safety in School (2019)

- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019)

2. What is Safeguarding and Child Protection?

- Safeguarding applies to all children and young people.
- Child Protection applies to a group of children who have/are experiencing abuse in their lives.

Safeguarding and promoting the welfare of children involves:

- 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
- Taking action to enable all children to have the best outcomes.

3. Aims

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

- Providing an environment in which children feel safe, secure, valued and respected; confident to talk openly and sure of being listened to.
- Providing suitable support and guidance so that children have a range of appropriate adults who they feel confident to approach if they are in difficulties.
- Using the curriculum to provide opportunities for increasing self-awareness, self-esteem, assertiveness and decision making so that pupils have a range of contacts and strategies to ensure their own 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 and are able to 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 liaison with other agencies where possible.
- Making safeguarding 'everyone's responsibility' and ensuring that we all recognise that it could happen within our school.

4. Roles and Responsibilities

The role of the school is to contribute to the identification, referral and assessment of children in need, including children who may have suffered, may be suffering, or who are at risk of suffering significant harm. Safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised in school.

All staff, including peripatetic, domestic and grounds staff in school have a role to play in relation to:

1. Protecting children from abuse

2. Promoting the welfare of children
3. Preventing children from being harmed
4. Preventing children from becoming radicalised

The Designated Safeguarding Leads and the Deputy Designated Safeguarding Leads form the Safeguarding Team at The Banda. Alongside them, the School Nurse, the School Counsellor and the Head of Well-being are also a vital part of the Safeguarding Team. Members of the team will meet weekly to discuss pupils of concern and follow up on action required, taking into account the need for confidentiality in certain cases.

Role	Named contact
DSL	Mrs Lucy Haywood – Senior Deputy Head – l.haywood@bandaschool.com
DSL (Pegasus Early Years)	Mrs Saffron Muigai – Head of Pegasus Early Years – s.muigai@bandaschool.com
Deputy DSL	Mr Boniface Macharia – Assistant Director Pastoral – b.macharia@bandaschool.com
Deputy DSL	Mrs Katie Rogers – Head of Lower School – k.rogers@bandaschool.com
Chair of Governors	Mr David Hutchison – office@bandaschool.com

The Designated Safeguarding Leads (**DSL**) are responsible for:

- Coordinating child protection action within school
- Meeting regularly with the Child Protection Advocacy Network in Nairobi. This network comprises medical and legal professionals. The DSLs (or Deputy DSLs) meet with representatives on an annual basis (either in person or online) for updates and training.
- Ensuring that established procedures are followed including reporting and referral processes
- Acting as a consultant for staff to discuss concerns
- Bringing concerns to the attention of the Head and making referrals as necessary
- Maintaining a confidential recording system using CPOMS, ensuring that it is used effectively for recording child protection information and any relevant Action plans
- Organising training for all school staff, including domestic, Extras and peripatetic staff
- Liaising with the School Counsellor and other professionals when necessary
- Transferring records when a child changes school (when necessary)
- Meeting regularly with the Designated Governor and keeping them abreast of any safeguarding updates and cases of child abuse
- Ensuring names of the DSLs are updated and displayed prominently

5. Training

All staff and volunteers must be provided with induction training that includes child protection as they start work at The Banda. Members of staff receive annual child protection training – this may be full training or on focused safeguarding areas (see appendix for training schedule). All staff are asked to read the school's Safeguarding Policy, the Staff Code of Conduct and Part 1 of 'Keeping Children Safe in Education'. Elements of this training can be supplemented by online training programmes (Educare).

The DSLs and Deputy DSLs undertake regular training which includes the Level 3 Child Protection training. Training and updates also involve meeting with other DSLs from Prep Schools within Kenya; meetings and training with the Child Protection Advocacy Network (CPAN); and reading updates and bulletins. They are also trained in the prevent duty. School Governors are trained in safeguarding and the prevent duty by the DSL, as well as specific online training courses for Governors.

All 'Extras' and 'Peripatetic' staff are trained by the DSL. All domestic staff (eg kitchen staff, guards and cleaning staff) are also provided with annual training. A leaflet in Kiswahili serves as a reminder of the key elements of safeguarding (see appendix).

6. General Strategies

At The Banda we have implemented strategies to address safeguarding issues.

These include:

- Health and Safety procedures
- Risk Assessments
- Safer recruitment procedures including the need for DBS checks and references. A reference form is used to ensure that all relevant safeguarding questions are addressed for each candidate. Questions relating to safeguarding are always used in interviews – see Safer Recruitment Policy
- Strong Home/School Links
- Complaints Procedures
- Anti-Bullying Policy, ESafety Policy, Behaviour Policy and Staff Code of Conduct
- Good role modelling from staff

All children are encouraged to take on responsibilities and roles to ensure the safe keeping of themselves and each other.

7. What Is Child Abuse?

The NSPCC (UK) defines child abuse as: "Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online."

"Abuse is always wrong and it is never the young person's fault".

It should not be assumed that pupils at a school such as The Banda will not be subject to abuse. Staff must report any safeguarding concern to a DSL, however small or uncertain it may initially appear. Staff are not expected to decide whether a concern meets a particular threshold before reporting it. Staff should always be sympathetic and supportive and act in the best interests of the child.

See Appendix 1 below for definitions of the different types of abuse.

8. Responding to Concerns

Any concern should be passed on to a DSL. It is important that a professional who sees an injury on a child takes careful note of time, place, sequence of events, nature of injury etc. The concerns should be passed on as soon as possible either verbally, or through CPOMS. Note that although children do have a variety of accidents, the most common types of injury they sustain in everyday life are usually different from the injuries caused by abuse.

It is important to recognise that significant harm can be '**actual**' (that is happening now – bruises, injuries, neglect for example) or could be '**likely**' (in the sense that unless action is taken now the child may be exposed to significant risk of harm in the future). We must be alert for the potential need for 'Early Help' as a means of protecting a child from possible abuse.

9. Handling Disclosures

Although staff may not seek information, a pupil may wish to confide about having suffered some kind of abuse. The following guidelines should be helpful:

- Find somewhere quiet to talk as soon as possible
- Stay calm and reassuring
- Explain that you cannot promise to keep what you are told a secret – you may have to inform the DSL
- Listen to, and believe, what the pupil tells you without any demonstration of shock, and tell them that whatever the circumstances, they are not to blame
- Allow the child to talk freely but do not press for details or ask leading questions – some cases may need further investigation. It is better for the child not to have to repeat details unnecessarily
- Do not carry out any physical examination of the pupil and do not take photographs of injuries. A medical examination can only be carried out by the School Nurse or a doctor, with the pupil's consent
- If possible, take some written notes so that all details can be remembered
- Leading questions should be avoided. Questions such as "Did he do X to you?" should not be asked but questions such as "Is there anything else you want to say?" would be sensible
- Ask the pupil if he/she has told anyone else
- Do not make promises to the pupil – the situation may cause you to react emotionally and you could make promises that cannot be kept
- Reassure the child that they have been heard and explain what you will do next and to whom you will talk
- Alert the DSL immediately. If away on a school trip, tell the person in charge of the group. Contact should then be made with the DSL or the Head
- Record the following on CPOMS: Child's name, date of birth, the incident that has given rise to concern (include date and time), a verbatim record of what the child has said, a record of bruising/injuries and any action taken
- The incident should not be discussed with anyone else once it has been reported on, unless requested by the Head or DSL

10. The Responsibility of the Head and the DSL

The Head and the DSLs:

- Decide whether to take further action about specific concerns
- Liaise with the School Counsellor or relevant members of CPAN within Nairobi
- Should the concerns be related to the Prevent Duty, advice from the school's Head of Security along with the Child Protection Advisory Network will be sought
- If a referral is made to any further agency, a DSL will ensure that a written report is made of the concerns
- Ensure that confidential records are kept securely and the relevant information available to staff with immediate responsibility for a child's welfare. Records will be kept on the child protection database, CPOMS, and can only be viewed by the DSLs. These records should be updated with any further developments in the case, including reasons why action has or has not been taken
- Pass on relevant safeguarding information to future schools
- Ensure that particular attention will be paid in monitoring the attendance and development of any pupil who has been identified as at risk
- Inform the designated Board member of any allegations of child abuse
- Provide support for any staff member affected by issues arising from concerns for children's welfare or safety

11. Confidentiality

Staff have a professional duty to share confidential information about the protection of children with the DSL. Staff should take care not to discuss information given in confidence outside the appropriate professional contexts.

12. Responsibility of the Board

The Liaison Governor for child protection is responsible for:

- Reviewing the procedures and their efficiency
- Ensuring any deficiencies or weaknesses of the arrangements are remedied quickly
- Approving amendments to the arrangements in the light of changing regulations or recommended best practice
- An annual review of the Safeguarding Policy
- Ensuring that the Safeguarding Policy is known in practice, ie. Do all staff know who to go to in the case of suspected abuse?
- Reviewing how children are taught about safeguarding
- The Liaison Governor should meet regularly with the DSL to discuss current child protection cases (anonymized), walk the school site, and review training.
- External inspections take place approximately every 3-5 years by an international inspection body which involves a thorough inspection of safeguarding procedures.
- An annual review of filtering and monitoring provision will be shared with the Liaison Governor.

13. Raising Awareness with Pupils

The Banda School prides itself on its culture of friendly relationships between staff and pupils. We prepare all of our pupils to make reasoned, informed choices, judgments and decisions. An important part of the role of the Class teacher and Form Tutor is to ensure that pupils know the school has their safe keeping and happiness as a priority and who they can approach in school if they have any worries about keeping themselves safe.

School Assemblies, Form sessions and PSHE lessons are a valuable time for teaching about Kenyan and British fundamental values and the importance of building resilience in the pupils. We encourage open discussion and the need to value your own opinions.

14.Risks linked to Online Harm and AI

The school recognises that artificial intelligence (AI), including generative AI tools, presents both educational opportunities and safeguarding risks. AI-related content is introduced in an age-appropriate manner. At The Banda, pupils do not have direct access to the main Generative AI platforms such as Chat GPT and Gemini, as many of these tools require users to be 13 or older.

Pupils learn about:

- The risks of deepfakes and AI-generated imagery
- Bias and inaccuracies in AI outputs
- Age restrictions on AI platforms
- Data privacy and the importance of not sharing personal information
- The need for human oversight
- Risks of over-reliance on AI
- Appropriate use of email
- The need to report any concerns that they may come across online

Within Staff training, importance is given to the need to remain alert to AI-related safeguarding concerns, including the creation or sharing of harmful or misleading content, AI-generated deepfakes or manipulated images, online grooming, bullying, misinformation, inappropriate or sexualised content, and any misuse of AI that may place children at risk of harm. The school ensures that AI forms an integral part of its online safety and PSHE curriculum. Any safeguarding concerns arising from the use or misuse of AI will be managed in accordance with the school's child protection procedures and reported to a Designated Safeguarding Lead (DSL).

An annual filtering and monitoring review will take place. This will:

- Assess whether filtering actively covers devices used on school networks, including school-owned devices used off-site.
- Ensure the provision has been checked specifically against AI-generated content, deepfake and nudification risks, not only long-standing harm categories.
- Be shared with the Safeguarding Governor.

15.Use of Mobile Phones and Other Devices

The School recognises that the use of wireless technology and other devices can play a part in the harassment and abuse of children. Through the internet and 'gaming' there is the potential for 'grooming' activity. This will not be tolerated and will be addressed and treated as any other allegation of abuse or bullying. Any member of staff or pupil of the school who has knowledge or a suspicion of such an issue should bring it to the attention of a DSL or Head who will take immediate steps to deal with the matter. Note that there is no access to social media sites during the school day (7.30am until 4pm). There is a robust firewall in place which prevents pupils from accessing inappropriate websites. Pupils are forbidden from bringing mobile phones to school or on school trips and all adults are reminded to use phones discreetly, out of the sight of children.

16.Children with mental health concerns

Mental health and wellbeing concerns should be taken seriously and responded to promptly. Where there is concern that a pupil's mental health is placing them at risk of significant harm, including through self-harm, suicidal thoughts, eating disorders or other serious risk-taking behaviour, this must be treated as a safeguarding concern and referred immediately to the DSL.

17.Children with Special Educational Needs or certain health conditions

Staff should be aware of the fact that children with special educational needs and disabilities or certain health conditions can face additional safeguarding challenges and are potentially at greater risk of abuse. They may be more prone to peer group isolation or bullying than other children and they may have communication barriers and difficulties in managing or reporting these challenges. They may have difficulty with emotional regulation and be prone to specific triggers, and their behaviour or communication may be a response to distress or unmet needs. An increased availability of mentoring and support for these children is required and staff should be vigilant in the monitoring of their emotional well-being.

18.Transparency

The Banda School prides itself on its open, family atmosphere where respect and mutual tolerance are a priority. Parents/guardians have an important role in supporting The Banda School. Copies of this policy, together with our other policies are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the school. We will always undertake to share our concerns with and support parents/carers but the school is required to take into account the safety of the pupil.

19.Safe Employment Practices

We follow UK government guidelines regarding safe employment practices. These include appropriate criminal-record and child-suitability checks, identity and qualification checks, satisfactory references, verification of employment history and consideration of any relevant overseas checks. Where appropriate, the School will also undertake online searches of shortlisted candidates as part of its safeguarding due diligence. All members of the teaching and non-teaching staff at the school, employed from within Kenya require the Kenya Police Certificate of Good Conduct (KPCGC) before starting work. International employees require an International Child Protection Certificate.

20.School Counsellor

- The Banda has a fully qualified School Counsellor, who is registered and licenced with the Counsellors and Psychologists Board Kenya.
- The Counsellor is part of the Safeguarding team.
- A child will be referred due to certain indicators such as: emotional distress, mental health concerns, unexplained physical signs, behavioural changes, disclosure of abuse, or self-harm signals. Referrals may be made verbally or in writing.

- The Counsellor must alert a DSL or their deputy as soon as a safeguarding concern arises. The DSL will decide how best to proceed based on the severity or urgency of the risk.
- The Counsellor will carry out an assessment of a pupil and will decide whether regular counselling sessions are required.
- The Counsellor will offer emotional or therapeutic support in a safe, child-centred way.
- All details will be recorded clearly and kept confidentially.
- Parents will be contacted if the School Counsellor decides that regular sessions are required. Further follow up with parents via meetings or email will continue throughout the time of counselling sessions.
- These sessions are time limited, and a decision on this will depend entirely upon the needs of the child.
- Continued monitoring of the child by the counsellor and the wider Safeguarding Team will take place, along with further discussion with the DSL where necessary.
- Support for the Counsellor will be provided through supervision check-ins and peer collaboration.

21. Taking, Storing and Using Images of Children

The School has a resource bank of photographs of school events and occasions. This data bank is accessible only to members of the teaching staff and the marketing team who have passwords into the system. It is used as a record of events, visits and special occasions. Parental consent is sought on the use of images as part of the admissions process whereby they are given the chance to opt out of their child's photograph being used for, for example, the weekly newsletter, the website, social media or marketing material. If a parent withholds consent, images of their child will not be used. Should photographs of children be used by the school, no pupil names should accompany the images.

22. Visiting Speakers

Any visiting speaker should be approved by the Head with a clear understanding of why the speaker has been chosen. Where possible the speaker should come from an established company, charity or other group whose aims are well-documented. Visitors should not be left alone with the children unless a Certificate of Good Conduct has been seen. Visiting speakers are asked to sign a declaration which states that they understand their role in the Prevent Duty and will not incorporate any form of inciteful or insulting content in their presentation. Any presentation should be sent to the school in advance so that it can be checked in advance.

23. Allegations against adults working for or on behalf of the School

The School recognises that safeguarding concerns may arise about any adult working in or for the School, including teachers, leaders, governors, volunteers, contractors, peripatetic staff, domestic staff, security staff, drivers and visiting professionals.

An allegation requiring formal safeguarding action may arise where an adult has harmed a child or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way indicating a risk of harm; or behaved in a way raising serious concerns about suitability to work with children.

Any such concern must be reported immediately to the Head and DSL, unless the concern is about the Head. A concern about the Head must be reported to the Chair of Governors.

The School will assess immediate risk, protect the child, preserve relevant information and seek advice or make referrals to appropriate Kenyan authorities. The School will not conduct an internal investigation that could compromise an external investigation.

The School will provide appropriate support to the child and, where appropriate, to staff affected by the allegation. Confidentiality will be maintained and information shared only on a need-to-know basis.

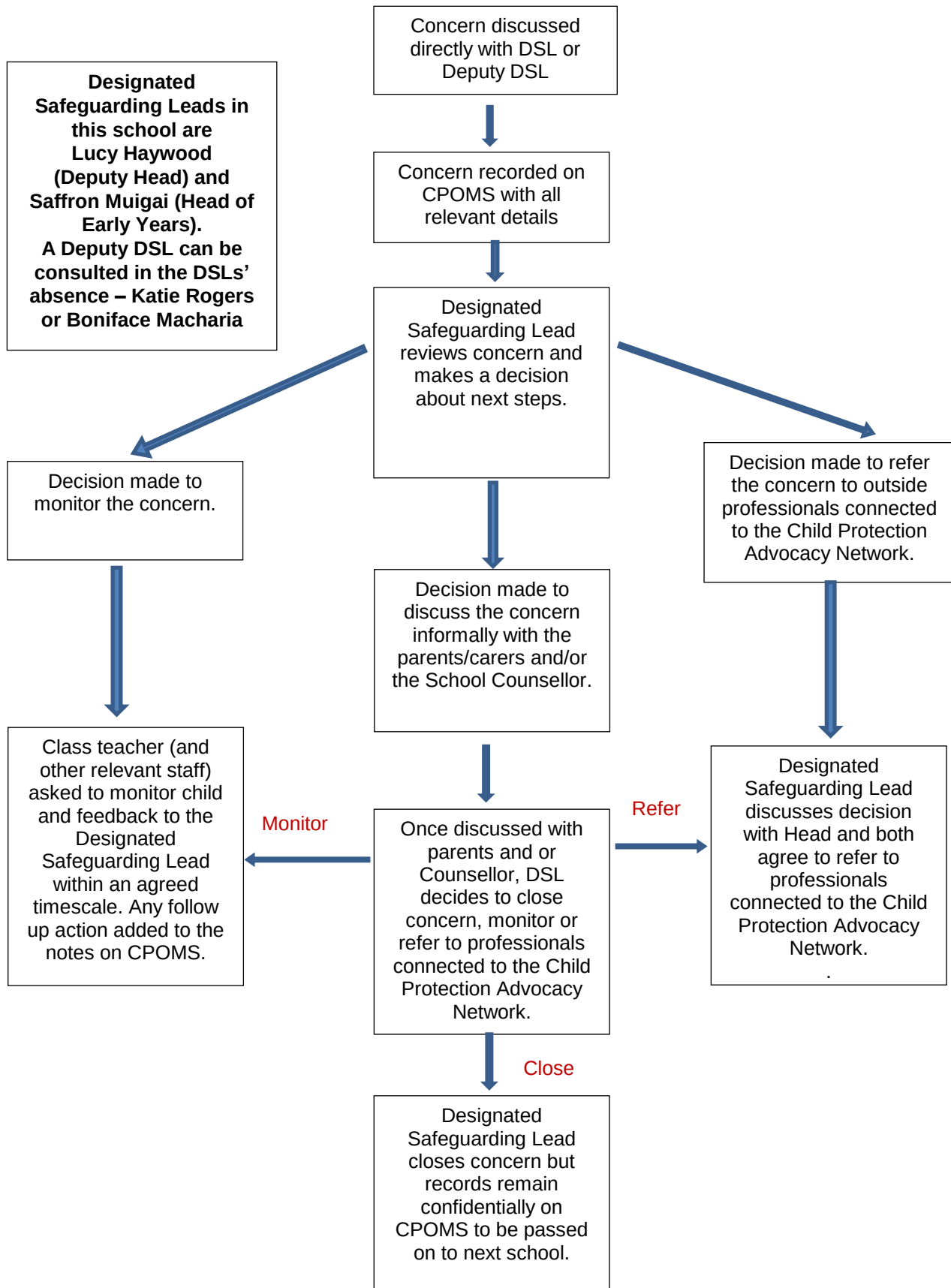
24. Low Level Concerns about Staff Behaviour

A low-level concern should be reported promptly to the DSL or Head. A low-level concern is a concern, however small, that an adult working for or on behalf of the School may have acted inconsistently with the Staff Code of Conduct or professional boundaries but does not meet the threshold for a formal allegation. Examples may include inappropriate language, over-familiarity, unnecessary physical contact, favouritism, inappropriate digital communication, being alone with a child contrary to procedure, or other behaviour that causes discomfort or concern.

The Head will be responsible for deciding the appropriate response and ensuring that the concern is recorded, reviewed and considered alongside any previous concerns about the individual. Where the concern relates to the Head, it must be reported to the Chair of Governors. Where the concern relates to a contractor, agency worker or other externally employed adult, the relevant employer should be informed where appropriate.

Any allegations should remain strictly confidential.

25. FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



Other relevant documentation for staff:

- Keeping Children Safe in Education (September 2026)
- Disqualification under the Childcare Act 2006 (February 2015)
- What to do if you're worried a child is being abused (March 2015)
- Working Together to Safeguard Children (2026)
- Prevent Duty Guidance: for England and Wales (July 2019)
- The Prevent Duty – Departmental advice for schools and childminders (June 2015)
- The use of social media for on-line radicalization (July 2015)
- UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2016)
- Staff Code of Conduct
- The Behaviour Policy
- The Safer Recruitment Policy
- The Anti-Bullying Policy
- Whistleblowing Policy

Date of next review: September 2027

Appendix 1

Different types of abuse

1. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
2. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
3. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
4. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse).
5. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure

access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

6. **Affluent Neglect:** Affluent neglect refers to the neglect experienced by children in wealthy families. This can be more difficult to spot, as the kind of neglect experienced by children and young people in these circumstances is often emotional. Children from wealthier, more "stable" families aren't as sheltered from neglect as is often assumed.

There are several barriers that may prevent more affluent children, who are experiencing these types of neglect, from accessing the support they need. Firstly, their symptoms may be harder to spot. The nature of emotional neglect can make it much harder to identify than other types of neglect. For example, due to the family having hired help to care for the children they may present as clean, well-dressed, and properly fed when they are, in reality, experiencing emotional neglect.

7. **Female Genital Mutilation (FGM):** professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents who wish to withdraw their children from learning about FGM. FGM is illegal in Kenya and therefore any suspected case should be reported to the DSL, who will then gain advice from the relevant member of the Child Protection Advisory Network and, if deemed appropriate, will contact the police.
8. **Honour-based Abuse (HBA):** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL.
9. **Radicalisation:** the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist activity. All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Background checks may be carried out on certain families where children may be deemed to be at risk, through our security provider.

As part of their child protection training, all staff have been informed as to what they should do should they have any concerns of this nature. Pupils' resilience to radicalisation is built by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. The Banda promotes the spiritual, moral, social and cultural development of pupils and, within this, fundamental British and Kenyan values. This is largely carried out through the PSHE curriculum.

10. Children who run away or go missing: Staff should be alert to the attendance of pupils and liaise with the DSL if they have any concerns about a child missing significant amounts of school time. As part of our registration procedures, parents will be contacted if a pupil fails to register in the morning and the school has not been informed about their absence. Parents will be asked to provide at least two contact numbers which can be used in the case of an emergency.

11. Child on child abuse: Any form of bullying is taken very seriously at The Banda (see our Anti-Bullying Policy). This may be verbal, emotional, physical, or a form of cyber bullying. It may comprise of sexual violence or harassment, racist abuse or involve initiation-based violence. Any concern involving child-on-child abuse should be reported to the DSL. The school will assess the nature, seriousness and context of the concern and determine the appropriate response.

Cyber bullying may involve making and sharing nudes and semi-nudes via social media. In such a case, all pupils, whether perpetrator or victim, will be treated as being a safeguarding concern, whether the sharing was consensual or non-consensual. AI-generated or digitally manipulated sexual imagery involving a child is a safeguarding concern whether or not the image is "real", and whether it was created or shared by a pupil or another person.

All staff will be vigilant to indicators of involvement in serious violence, including association with gangs, weapon carrying and criminal exploitation. Any member of staff who has a concern about a child carrying or using a weapon, or expressing an intention to do so, should report it to a DSL or the Head.

The school adopts a zero-tolerance approach to misogynistic attitudes, language, harassment and behaviour, recognising that these can contribute to harmful sexual behaviour and violence against women and girls. Incel ideology normalises disrespect toward female peers, which can manifest in sexual harassment, image-based abuse (sharing intimate images without consent), online stalking, and coercive control.

Staff should be alert to the disproportionate impact that misogynistic attitudes and gender-based harassment may have on girls, while recognising that any pupil may be affected and that pupils of any gender may perpetrate or experience harmful behaviour. All cases will be treated seriously – abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Staff will challenge inappropriate behaviour, promote respectful relationships and report concerns to a DSL. Any incidents of child on child abuse will be recorded on CPOMS.

12. Domestic abuse: Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may

have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships.

13. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

14. Signs and Symptoms of abuse:

- Repeated minor injuries that are unexplained
- Children who are dirty, smelly, poorly clothed or who appear underfed
- Children who have lingering illnesses which are not attended to, deterioration in school work, significant changes in behaviour, aggressive behaviour, severe tantrums
- An air of 'detachment' or 'don't care attitude'
- Overly compliant behaviour
- A 'watchful attitude'

- Sexually explicit behaviour (eg. Playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- A child who is reluctant to go home or is kept away from school for no apparent reason
- Does not trust adults, particularly those who are close
- 'Tummy pains' with no medical reason
- Eating problems, including over-eating, loss of appetite
- Disturbed sleep, nightmares, bed wetting
- Running away from home, suicide attempts
- Self-inflicted wounds
- Reverting to younger behaviour
- Depression, withdrawal
- Relationships between child and adults which are secretive and exclude others
- Pregnancy
- When explaining injuries parents are defensive compared to genuine accidents when parents are usually distressed or blame themselves, or explanations are incompatible eg description of minor accident in relation to a major injury

These signs are not evidence themselves but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs, but we should also ensure we have an 'it could happen here' attitude. Abuse is not easy to diagnose, even for experts.

Appendix 2:

Useful contact details:

- For **medical** concerns – Karen Surgery, Nairobi – +254 (0)733642246 / +254 (0)775642246 Receptionist@KarenSurgery.com
- The **Child Protection Advocacy Network** is made up of legal, counselling, and medical professionals, representatives from the police and from child-related charities operating in Kenya, psychologists, a child officer. Should you wish to contact any of these professionals please follow this up through The Banda School's DSL, Lucy Haywood – l.haywood@bandaschool.com
- Childline Kenya – **The National Child Helpline 116**. (Free/ 24 hours, WhatsApp: 0722 116 116.) This is an NGO that works in the child protection sector to create awareness of children's rights. This is a 24-hour, toll-free telephone and web-based helpline for children.
- The Police (Call 911)
- DCI Toll free hotline – 0800 722203
- The Gender Violence Recovery Centre
- The Anti FGM board
- The department of public prosecution FGM hotline (0770610505)
- Marie Collins Foundation - <https://www.mariecollinsfoundation.org.uk/> - advice about sexual abuse online
- Lucy Faithfull - <https://www.lucyfaithfull.org.uk/> - advice for parents and carers who are concerned about someone's behaviour
- Childnet - <https://www.childnet.com/> - Helpful information and guidance for parents and carers on a range of key online safety topics
- <https://saferinternet.org.uk/guide-and-resource/parents-and-carers> - tips and guidance for parents and carers about online safety

Appendix 3:**Record of Safeguarding Training
The Banda School**

Date	Content of Training	Training Delivered to:	Trainer
Sept 2026	KCSIE 2026 updates Focus on AI risks & misogyny	All teaching staff and assistants, IT and Medical staff.	LH
Aug 2026	Safeguarding and Safer Working Practices Overview	All auxiliary staff - security, kitchen, garden, cleaning, admin, peripatetic Music.	LH
Oct 2025	Safeguarding and Safer Working Practices Overview	All peripatetic and Extras staff	LH
Sept 2025	KCSIE 2025 updates Focus on AI and Online Safety Safer working practices	All teaching staff and Assistants	LH, BM
Aug 2025	Safeguarding and Safer Working Practices Overview	All auxiliary staff - security, kitchen, garden, admin.	LH
June 2025	Level 3 Child Protection Training for all DSLs and Deputy DSLs	DSLs – Lucy Haywood, Saffron Muigai DDSLs – Boniface Macharia, Katie Rogers	The Safeguarding Alliance
Sept 2024	KCSIE 2024 updates Focus on Affluent Neglect case studies Safer working practices	All teaching staff and Assistants	LH / TM
Aug 2024	Safeguarding and Safer Working Practices Overview	All auxiliary staff - security, kitchen, garden, admin.	LH
Feb 2024	Safeguarding and Safer Working Practices Overview	All peripatetic and Extras staff	LH
Sept 2023	KCSIE 2023 updates Safer Working practices Focus on Affluent Neglect	All teaching staff	LH
Aug 2023	Safeguarding and Safer Working Practices Overview	All auxiliary staff - security, kitchen, garden, admin.	LH
Sept 2022	Safeguarding and Safer Working Practices Overview	New peripatetic and Extras staff	LH
Sept 2022	DSL Training – online with Andrew Hall Safeguarding in Schools (UK)	DSLs – Lucy Haywood and Tracey McVey	Andrew Hall
Sept 2022	KCSIE 2022 updates and child protection refresher	All teaching, Governors, administration and medical staff	LH
Jan 2022	Safeguarding and Safer Working Practices Overview	All peripatetic and Extras staff	LH
Jan 2022	Safeguarding and Safer Working Practices refresher	All domestic staff – security, kitchen, garden, admin.	LH
Nov 2021	KCSIE 2021 updates, focus on:	All teaching staff	LH

	• Peer on peer abuse • Low level concerns		
Sept 2021	Safeguarding and Safer Working Practices Overview	Induction for new staff	LH
October 2020	KCSIE 2020 updates	All teaching staff	LH
Sept 2020	Safeguarding and Safer Working Practices Overview	Induction for new staff	
March 2020	KCSIE / Safeguarding and Safer Working Practices	All teaching staff	LH
Oct 2019	Safeguarding and Safer Working Practices overview	All Extras and peripatetic staff	LH
Sept 2019	Safeguarding and Safer Working Practices refresher	All domestic staff – security, kitchen, garden, admin.	LH
Sept 2019	Safeguarding and Safer Working Practices Overview	Induction for new staff	LH
June 2019	DSL Safeguarding Training with Andrew Hall Safeguarding in Schools in UK	Lucy Haywood	Andrew Hall

Appendix 4:

Child Protection Procedures at The Banda School

This proforma must be signed by all employees and returned to the HR Department.

I am aware of the Designated Safeguarding Leads and Deputy Designated Leads at The Banda School; any concern of any kind no matter how trivial relating to Child Protection must be relayed to one of the DSLs without delay.

I understand that I may not offer any guarantee of confidentiality to any parent or child in any matter relating to Child Protection. I understand that I have a legal and statutory responsibility to report any disclosure concerning Child Protection. I understand that failure to report any such disclosure made to me will lead to disciplinary action being taken against me.

I am aware that information concerning School policy on Safeguarding and Child Protection is to be found on the school network and all members of staff have access to related documents. I understand my obligations in responding to School policy and procedure.

I have read the Banda School Policy and Procedure relating to Child Protection and other documents regarding the welfare of children and staff in educational settings. (The Safeguarding Policy, The Staff Code of Conduct and the Behaviour Policy) In addition I have read the most recent version of the document – Keeping Children Safe in Education (KCSIE) Part 1.

I understand and accept my responsibilities outlined above in respect of Banda School policies and procedure on Child Protection and Bullying. I understand that I will be offered regular training to update my knowledge and understanding of issues surrounding Child Protection.

Name:

Signature:

Date:

Please keep a copy of this acknowledgement in your own files and return the top copy to the HR Department. It will be stored in a file for accountability purposes. This file applies to all members of the community – full time, part time, volunteers, peripatetic staff etc.

Appendix 5: A Guide in Kiswahili for Best working Practices at The Banda



Kwa Wakati wote

- ✓ Hakikisha unafanya kazi katika mazingira yaliyo wazi.
- ✓ Jiepushe kukaa peke yako na mwanafunzi pasipo watu wengine.
- ✓ Wahudumie wanafunzi wote kwa usawa na heshima licha ya ulemavu, rangi, mila au dini yao.
- ✓ Kuwa kielelezo chema katika tabia, mavazi na lugha.
- ✓ Iwapo umeshuhudia jambo ambalo linahatarisha mwanafunzi, tafadhali mjulishe Bi. Lucy Haywood.
- ✓ Iwapo ajali imetokea, mjulishe Sister Tania au utafute usaidizi kwa wahudumu wa kwanza.
- ✓ Ni budi kutekeleza kazi yako kwa njia ya heshima palipo wanafunzi humu shuleni.

Usiwahi

- X Kupuuza malalamishi kutoka kwa mwanafunzi
- X Kupuuza ishara za unyanyasaji wa kimwili na hisia.
- X Kufunga milango, kufunika madirisha au kutumia ilani isemayo 'Usisumbue'
- X Kumuaibisha mtoto au kumkemea kiwango cha kumfanya alie
- X Kujihusisha na michezo ambayo inaweza kusababisha maumivu, au michezo inayochochea mambo ya ngono.
- X Kukubali au kujihusisha na tabia ya kugusa mwanafunzi kwa njia isiofaa.
- X Kukubali mwaliko wa urafiki katika mitandao ya kijamii kama Facebook.
- X Kumbeba mwanafunzi kwenye gari lako pasipo ruhusa kutoka kwa shule au mzazi wa mwanafunzi.
- X Kugusa mwanafunzi ila katika hali ya dharura.