Safeguarding and Child Protection Policy and Procedures

Effective from: 1 September 2026
Last reviewed: October 2026
Next review due: August 2027

KING'S COLLEGE SCHOOL
PANAMA

An inspired School

Safeguarding and Child Protection Policy and Procedures

King's College School, Panama

Primary person responsible for implementation and monitoring of this policy.	Zoe Pett Deputy Head - King's Experience & Designated Safeguarding Lead 507 282 3300 zoe.pett@kings.education
Adopted:	August 2022
Effective from:	1 September 2026
Next review:	August 2027

Key school Contacts

Designated Safeguarding Lead (DSL), including EYFS provision	Email: zoe.pett@kings.education Telephone number +507 282 3300 Holiday contact number: +44 7740936771
Deputy Designated Safeguarding Lead[s] (DDSL)	Email: paula.rivas@kings.education Telephone (+507 282 3300 term time): Holiday contact number: +44 7740936771
Head of School	Email: robert.pett@kings.education Telephone number: +507 282 3300
Governance – Regional CEO	Email: Eleanor.Prescott@inspirededu.com
Global Head of Safeguarding Governor	Jez Prior: + 44 7823 468657 jez.prior@inspirededu.com
Human Resources Lead	Leyda Lopez leyda.lopez@kingsgroup.org

Key External Contacts

SENNIAF

National Secretariat for Children, Adolescents and the Family

Hotline for reporting violations of rights: 6378-3466
Psychological Assistance Line: 6378-7876
Main Office, Panama City: +507 504-4052 / 504-3983 / 504-0080

Emergency Services

General Emergency Number: 911
National Police: 104
National Police Main Switchboard: +507 511-7000
Citizen Help Centre: 311

Fiscalía de Niñez y Adolescencia (Public Prosecutor)

Relevant Juzgado de Niñez y Adolescencia (Children and Adolescents Court)

Appropriate MEDUCA safeguarding or child-protection contact

External contact details are reviewed regularly and verified as part of the annual safeguarding review.

1. Aims

Safeguarding and promoting the welfare of children is everyone's responsibility.

King's College School Panama is committed to a child-centred safeguarding culture in which the best interests of the child are at the heart of decisions, systems, policies and professional practice.

The aims of this policy are to:

- safeguard and promote the welfare of every pupil;
- provide help and support as soon as concerns or needs emerge;
- protect children from maltreatment, abuse, neglect and exploitation, whether within or outside the home, at School or online;
- ensure that all staff understand how to recognise and respond to safeguarding concerns;
- maintain clear procedures for reporting, recording, referring and managing concerns;
- ensure pupils feel confident that they can report concerns and will be listened to, taken seriously and supported;
- maintain a culture in which child-on-child abuse, sexual harassment, sexual violence, discrimination and harmful behaviour are recognised, challenged and addressed;
- safeguard children from harmful and inappropriate online material and emerging technological risks;
- promote effective early support and intervention;
- work effectively with parents, SENNIAF, the police, health professionals and other relevant agencies;
- ensure allegations or concerns relating to adults are reported and managed appropriately;
- ensure safer recruitment and appropriate supervision of adults working with children; and
- continuously review safeguarding practice in response to emerging risks, changes in guidance and lessons learned.

Every pupil should feel safe, respected and protected from harm.

All members of the School community should feel able to raise safeguarding concerns, including concerns of a current or non-recent nature, knowing that concerns will be handled sensitively, professionally and appropriately.

2. Scope and Application

This policy applies to:

- all pupils under the age of 18;
- all staff, regardless of employment status;
- temporary and supply staff;
- trainee teachers;
- volunteers;
- contractors;
- coaches and activity providers;
- visiting professionals;
- governors and representatives of the Proprietor; and
- any other adult working for or on behalf of the School.

The policy applies throughout the School, including the Early Years Foundation Stage, during School-arranged activities, educational visits, sporting events, residential trips, transport and other activities undertaken under the authority of the School.

Safeguarding concerns arising outside School, including during holidays or through online activity, will be considered where they may affect the safety or welfare of a pupil or the wider School community.

Where third-party organisations use School premises or provide activities for King's pupils, the School will require appropriate written safeguarding arrangements. These will address safer recruitment, staff safeguarding training, supervision, a named safeguarding contact and the reporting of concerns.

For safeguarding purposes, a child is anyone under the age of 18.

Where a student aged 18 or above raises or is affected by a safeguarding or welfare concern, the School will continue to respond appropriately through its pastoral and safeguarding procedures and involve relevant external services where necessary.

3. Regulatory Framework

King's College School Panama operates within the legal and regulatory framework of Panama.

This policy is designed to support compliance with:

- applicable Panamanian legislation relating to the protection, welfare and rights of children;
- the provisions of Law 285 of 15 February 2022, as amended, and its implementing regulations, including applicable duties relating to child protection, mandatory reporting and school attendance;
- relevant MEDUCA requirements;
- relevant SENNIAF child-protection arrangements;
- the *Standards for British Schools Overseas*;
- *Keeping Children Safe in Education 2026*, adopted by the School as its principal British safeguarding benchmark where compatible with Panamanian law and the international context;
- *Working Together to Safeguard Children*, where its safeguarding principles provide appropriate best-practice guidance; and
- Inspired Education safeguarding requirements.

Keeping Children Safe in Education is statutory guidance for schools and colleges in England. It does not create statutory powers or duties for King's College School Panama under English law. Its safeguarding principles and expectations are nevertheless adopted by the School as a benchmark for high-quality British safeguarding practice, subject at all times to Panamanian law.

This policy should be read alongside:

- Staff Code of Conduct;
- Behaviour Policy;
- Anti-Bullying Policy;
- Online Safety Policy;
- Acceptable Use of Technology Policy;
- Mobile Phones and Personal Smart Devices Policy;
- Sharing Nudes and Semi-Nudes Policy;
- Relationships Education, Relationships and Sex Education and Health Education Policy;
- PSHE Policy;
- Inclusion Policy;
- Attendance Policy;
- Health and Safety Policy;
- Safer Recruitment Policy;

- Whistleblowing Policy;
- Risk Assessment Policy;
- Missing Child Policy;
- Data Protection Policy; and
- relevant educational visits and supervision procedures.

Where there is any conflict between overseas guidance and applicable Panamanian law, Panamanian law takes precedence.

4. Publication and Availability

This policy is published on the School website and is available to parents, staff and other members of the School community.

A hard copy or accessible version will be made available on request.

The School will communicate its safeguarding arrangements in age-appropriate ways to pupils and ensure that pupils know:

- who they can speak to if they are worried;
- who the DSL and DDSL are;
- how to report a concern;
- that concerns will be taken seriously; and
- that they will be supported.

5. Definitions

Safeguarding

Safeguarding and promoting the welfare of children means:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring children grow up in circumstances consistent with safe and effective care; and
- taking action to enable children to achieve the best possible outcomes.

Abuse

Abuse is a form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Abuse may occur:

- within or outside the family;
- within School or another institution;
- within the community;
- online;
- through technology;
- between adults and children; or

- between children.

The principal categories are:

- physical abuse;
- emotional abuse;
- sexual abuse; and
- neglect.

Exploitation, including sexual, criminal and financial exploitation and modern slavery, is also a significant safeguarding concern.

Child-on-Child Abuse

Child-on-child abuse is abuse by one child or group of children against another child.

It can occur inside or outside School and online and may include harassment, violence, harmful sexual behaviour, bullying, coercion, exploitation and abuse within intimate relationships.

Harmful Sexual Behaviour

Harmful sexual behaviour includes sexual behaviours expressed by children that are developmentally inappropriate, problematic, abusive or violent and which may cause harm to the child themselves or another person.

Sexual behaviour exists on a continuum. Early identification and proportionate intervention are important in preventing escalation.

DSL and DDSL

DSL means the School's Designated Safeguarding Lead.

DDSL means Deputy Designated Safeguarding Lead.

The DDSL may undertake DSL functions when appropriately trained and authorised, but overall lead responsibility remains with the DSL.

6. Responsibility Statement and Allocation of Tasks: King's College School Panama's Approach to Safeguarding Leadership

Governance and Proprietorial Oversight

Inspired Education provides governance and proprietorial oversight of safeguarding.

Safeguarding is reviewed through an established cycle involving the Head of School, DSL, Regional CEO and Global Head of Safeguarding.

Oversight includes consideration of:

- safeguarding concerns and trends;
- referrals and external-agency involvement;

- allegations and low-level concerns relating to adults;
- child-on-child abuse;
- bullying and discriminatory behaviour;
- online-safety incidents;
- attendance-related safeguarding;
- staff training;
- safer recruitment;
- filtering and monitoring;
- pupil voice;
- effectiveness of safeguarding systems;
- lessons learned from incidents; and
- actions arising from audits and reviews.

Head of School

The Head of School has overall responsibility for ensuring that effective safeguarding arrangements operate throughout the School.

The Head is responsible for:

- promoting a strong safeguarding culture;
- ensuring the policy is implemented;
- ensuring staff understand their responsibilities;
- ensuring sufficient resources, authority and time are provided to the DSL;
- managing allegations and concerns relating to adults, except where the concern relates to the Head;
- ensuring safeguarding considerations inform strategic and operational decision-making; and
- reporting appropriately to Inspired Education governance structures.

Designated Safeguarding Lead

The DSL is a senior member of the School's leadership team and has the status and authority necessary to lead safeguarding and child protection.

The DSL takes lead responsibility for:

- safeguarding and child protection;
- advice and support to staff;
- management of safeguarding concerns;
- decisions regarding external referrals;
- liaison with SENNIAF, police, health services and other agencies;
- online safety;
- understanding the filtering and monitoring systems in place;
- child-on-child abuse;
- children at greater risk of harm;
- safeguarding records;
- safeguarding training;
- pupil voice in safeguarding;
- support for staff managing safeguarding cases; and
- contributing to safeguarding audits and reviews.

The DSL must be given sufficient time, funding, training, resources and support to fulfil the role effectively.

Deputy Designated Safeguarding Lead

The DDSL is trained to an appropriate level and supports the DSL in carrying out safeguarding responsibilities.

When the DSL is unavailable, the DDSL will act without delay.

The absence of the DSL or DDSL must never prevent safeguarding action being taken.

7. Specific Safeguarding Duties in Relation to Children

Safeguarding is everyone's responsibility.

All staff must maintain an attitude of **"it could happen here"**.

The School will:

- act in the best interests of children;
- identify concerns as early as possible;
- provide support when problems first emerge;
- maintain effective reporting systems;
- promote trusted relationships between children and adults;
- listen to pupils and take their wishes and feelings into account;
- recognise that children may be harmed within or outside the home, at School, within the community or online;
- recognise that safeguarding issues frequently overlap;
- consider contextual and extra-familial risks;
- recognise that technology can facilitate or amplify abuse;
- promote attendance and respond to repeated or prolonged absence as a potential safeguarding indicator;
- provide appropriate safeguarding education through PSHE, RSE, assemblies, curriculum provision and pastoral programmes;
- maintain appropriate filtering and monitoring;
- respond to discriminatory, misogynistic, sexualised or abusive behaviour;
- identify children who may require additional support;
- work with parents and external agencies where appropriate; and
- maintain accurate and secure records.

Staff must never assume that somebody else will report a concern.

Where a member of staff is unsure whether something constitutes a safeguarding concern, they must speak to the DSL or DDSL.

8. Reporting Obligations of Staff

Reporting Obligations Generally

All staff must be vigilant and maintain an attitude of "it could happen here" where safeguarding is concerned.

When concerned about the welfare of a pupil, staff must always act in the best interests of the child.

All staff have a duty to report:

- concerns about a pupil's safety or welfare;
- disclosures or indicators of abuse, neglect or exploitation;
- concerns about another child's behaviour towards a pupil;
- concerns about an adult working with children;
- low-level concerns relating to adult behaviour;
- concerns about unsafe safeguarding practice; and
- relevant information which may contribute to an existing safeguarding picture.

Concerns about a pupil's safety or welfare must be reported immediately to the DSL or DDSL and recorded promptly on iSAMS Wellbeing Manager in accordance with the School's safeguarding procedures.

Concerns about the conduct of a member of staff or other adult, including low-level concerns, must be reported immediately to the Head of School in accordance with Section 15 and Appendix 3. These concerns will be recorded securely through the School's confidential staff safeguarding procedures.

Concerns about the Head of School must be reported directly to Inspired Education's Global Head of Safeguarding, with the Regional CEO informed as appropriate. Concerns about the DSL must be reported to the Head of School or escalated to the Global Head of Safeguarding where necessary.

A member of staff does not need proof that abuse has occurred before raising a concern.

Staff must follow up on safeguarding concerns they have reported where they have reason to believe that appropriate action has not been taken. Where a member of staff believes that the DSL or Head of School has failed to respond appropriately to a safeguarding concern, they must escalate the matter without delay to Inspired Education's Global Head of Safeguarding. Staff may also raise concerns through Inspired Education's SafeCall whistleblowing platform.

Failure to report safeguarding concerns may constitute serious misconduct, including gross misconduct where justified under applicable Panamanian law and the School's disciplinary procedures.

Receiving a Disclosure

Staff should:

- listen carefully;
- remain calm;
- take the child seriously;
- avoid expressing shock or disbelief;
- avoid leading questions;
- use open prompts where clarification is necessary;
- reassure the child that they were right to speak;
- explain that the information must be shared with those who need to help;
- never promise confidentiality;
- avoid investigating the allegation themselves;
- make an accurate record; and
- report immediately to the DSL or DDSL.

A child must never be made to feel that they are creating a problem by reporting abuse, neglect or exploitation, or be made to feel ashamed for doing so.

Children Who Do Not Disclose

Children may:

- not feel ready to disclose;
- not know how to disclose;
- fear consequences;
- feel embarrassed or ashamed;
- be subject to threats or coercion;
- have communication difficulties; or
- not recognise their experience as abusive or harmful.

The absence of a disclosure must never prevent staff from raising concerns based on professional observations.

If the DSL or DDSL is Unavailable

Staff must not delay action.

If neither the DSL nor DDSL can be reached and a child appears to be at immediate risk of harm, staff must contact an appropriate member of the Senior Leadership Team and, where necessary, SENNIAF, police or emergency services.

Any action taken must be communicated to the DSL as soon as practicable.

Action by the DSL

On receipt of a safeguarding concern, the DSL will determine the most appropriate response.

This may include:

- managing support within School;
- coordinating support through pastoral, counselling or inclusion structures;
- speaking with parents or carers where appropriate;
- seeking professional advice;
- completing or reviewing a risk assessment;
- making a referral to SENNIAF;
- involving police or emergency services; or
- engaging another appropriate external agency.

The child's views, wishes and feelings will be considered when determining the response, but they will not prevent action where safeguarding requires intervention.

If a referral is not made, the concern must remain under review where appropriate.

9. Managing Support for Pupils Internally

The School operates an early-support approach designed to identify needs and intervene before difficulties escalate.

The principles of KCSIE 2026's emphasis on early support and Family Help are reflected at King's through the School's pastoral, inclusion, counselling and safeguarding structures and through engagement with appropriate services available in Panama.

Staff should be particularly alert where a child:

- has a disability or medical condition and additional needs;
- has special educational needs;

- has a mental-health need;
- is a young carer;
- is pregnant or is a parent;
- has exhibited early signs of abusive, violent or harmful behaviour;
- is repeatedly removed from lessons or experiences repeated suspension or exclusion;
- is subject to a reduced or part-time timetable;
- is frequently or persistently absent;
- goes missing from School or home;
- is at risk of criminal, sexual or financial exploitation;
- is at risk of trafficking or modern slavery;
- is at risk of gang involvement or organised criminal activity;
- is at risk of radicalisation or extremist influence;
- has a parent or carer in custody or is affected by parental offending;
- lives in circumstances involving substance misuse, domestic abuse or serious adult mental-health concerns;
- misuses alcohol or drugs;
- is at risk of honour or faith-based abuse, FGM or forced marriage;
- is experiencing harmful relationships or coercive control;
- is socially isolated;
- is affected by significant bullying or discrimination; or
- is experiencing any other circumstance which may increase vulnerability.

Staff must avoid assuming that behaviour, mood, injury or communication difficulties are simply consequences of SEND, disability or an existing medical condition.

Support may include:

- pastoral intervention;
- counselling;
- inclusion support;
- family engagement;
- individual safety or welfare plans;
- risk assessment;
- medical support;
- academic adjustments;
- external professional advice; and
- referral to appropriate authorities or services.

Safeguarding takes precedence over routine pastoral processes where there is a risk of harm.

10. Making a Referral

Where a child is suffering, or is likely to suffer, harm, action must be taken promptly to protect the child.

The DSL will determine whether the appropriate response is:

- support within School;
- engagement with parents or carers;
- consultation with an external professional;
- referral to SENNIAF or another appropriate child-protection service;
- referral to police; or
- emergency intervention.

Where there is an immediate danger to a child or another person, emergency services must be contacted without delay.

The School does not apply English statutory referral thresholds or Children Act procedures as though they were Panamanian law.

The safeguarding principles contained within KCSIE 2026 and *Working Together to Safeguard Children* inform professional decision-making, while referrals are made through the appropriate Panamanian framework.

A child's wishes and feelings should be considered when determining action, but they are not determinative where safeguarding action is necessary.

Where a referral is not made, the DSL must ensure:

- the reasons are recorded;
- appropriate support is provided;
- the concern is kept under review; and
- escalation occurs if risk increases or the situation does not improve.

11. Allegations Against Pupils – Child-on-Child Abuse

King's College School Panama recognises that children can abuse other children.

Child-on-child abuse may occur:

- at School;
- outside School;
- online;
- within intimate relationships; or
- through a combination of online and offline behaviour.

It includes, but is not limited to:

- bullying, including cyberbullying and discriminatory bullying;
- physical abuse;
- abuse within intimate relationships;
- harmful sexual behaviour;
- sexual violence;
- sexual harassment;
- coercive or controlling behaviour;
- misogynistic or misandrist abuse;
- causing another person to engage in sexual activity without consent;
- making or sharing nudes or semi-nudes, whether consensual or non-consensual;
- digitally altered or AI-generated sexual imagery, including deepfakes or deep nudes;
- upskirting or similar invasive image-taking;
- initiation or hazing;
- online abuse;
- financial exploitation; and
- other behaviour involving harassment, humiliation, coercion, exploitation or violence.

All incidents involving nude or semi-nude imagery involving a child require a safeguarding response.

The School recognises that even where no child-on-child abuse has been reported, this does not mean that it is not occurring.

Staff must never dismiss abusive behaviour as:

- "banter";
- "having a laugh";
- "boys being boys";
- "part of growing up"; or
- normal relationship behaviour.

Misogynistic and other prejudicial behaviour will be challenged, particularly where patterns suggest escalating harmful behaviour.

Concerns must be reported to the DSL.

Safeguarding and disciplinary responses are distinct. A safeguarding response will always be considered even where behaviour is also addressed under the Behaviour Policy.

Detailed procedures are contained in Appendix 2.

12. Extra-Familial Harm

Children can experience harm outside their families.

This may occur:

- within peer groups;
- in relationships;
- in the local community;
- through organised networks;
- through gangs;
- during travel;
- through sporting or extracurricular environments; or
- online.

Extra-familial harms can include:

- sexual abuse and exploitation;
- sexual harassment;
- teenage relationship abuse, including physical, sexual or emotional abuse and stalking;
- criminal exploitation;
- financial exploitation;
- trafficking;
- modern slavery;
- serious violence;
- coercion;
- gang-associated harm;
- online exploitation; and
- radicalisation.

Children may be vulnerable to multiple forms of harm simultaneously.

A child cannot consent to their own exploitation.

Where a child has been coerced or exploited into harmful or criminal behaviour, staff must consider their vulnerability and safeguarding needs rather than viewing the behaviour solely through a disciplinary lens.

13. Risk Assessment

Where a safeguarding concern is identified, the School will consider whether a formal risk assessment or safety plan is required.

Risk assessments will be child-centred and proportionate.

They may consider:

- the nature and seriousness of the concern;
- immediate safety;
- vulnerability of the children involved;
- age and developmental stage;
- SEND or communication needs;
- relationship or power imbalance;
- online and offline risks;
- locations and times associated with risk;
- contact between involved pupils;
- potential risk to other children;
- transport, trips or extracurricular activities;
- support required; and
- external-agency advice.

Risk assessments will:

- identify actions;
- identify responsible adults;
- be recorded;
- be reviewed when circumstances change; and
- remain under active monitoring.

The DSL normally leads safeguarding risk assessment, with support from appropriate School leaders and external professionals.

14. What to Do if Staff Have a Safeguarding Concern About Someone Else's Welfare

Any safeguarding concern relating to a member of the School community which is not otherwise covered by a specific procedure must still be reported.

Staff should report the concern to:

- the DSL;

- the DDSL;
- the Head of School; or
- another appropriate senior leader where the above individuals are unavailable.

Concerns must not be ignored simply because the person concerned is not a pupil.

15. Allegations Made and/or Concerns Raised About Staff and Others in School

The School maintains an open culture in which concerns about adults are reported promptly.

This applies to:

- employees;
- supply staff;
- trainee teachers;
- volunteers;
- contractors;
- coaches;
- visiting specialists;
- third-party providers; and
- any other adult working with children on behalf of the School.

Concerns may:

- meet the harm threshold; or
- constitute a low-level concern.

A low-level concern is any concern, however small, that an adult may have acted in a way which is inconsistent with the Staff Code of Conduct or professional expectations.

Staff should report concerns about another adult immediately.

Concerns about a member of staff should normally be reported to the Head of School.

Concerns about the Head of School must be reported directly to Inspired Education's Global Head of Safeguarding without first notifying the Head. The Regional CEO may also be informed as appropriate.

Where an agency or external provider employs the adult concerned, the School and employing organisation will cooperate in responding to the allegation. The School retains responsibility for gathering and preserving relevant information relating to events occurring within the School or its activities.

The School will:

- protect children;
- take appropriate immediate action;
- record concerns;
- establish relevant facts without compromising any external investigation;
- seek advice from Inspired Education safeguarding and Human Resources leaders;
- involve Panamanian authorities where appropriate;
- consider suspension or alternative arrangements where proportionate;

- provide appropriate support; and
- ensure confidentiality is maintained as far as reasonably possible.

Detailed procedures are set out in Appendix 3.

16. Informing Parents

Parents or carers will normally be informed about safeguarding concerns affecting their child.

However, information will not be shared with a parent before consultation with the DSL where doing so may:

- increase the risk of harm to the child;
- place another person at risk;
- impede a police or child-protection investigation;
- lead to evidence being destroyed;
- cause a child to be removed from a protective environment; or
- otherwise be contrary to the child's best interests.

Decisions not to inform parents and the reasons for them must be recorded.

Where external authorities are involved, the School will take account of their advice regarding communication with parents.

17. Additional Reporting

The School will consider whether a safeguarding incident requires notification to:

- SENNIAF;
- police or other competent Panamanian authorities;
- Inspired Education safeguarding leadership;
- the Regional CEO;
- Human Resources;
- MEDUCA where required;
- insurers or legal advisers where appropriate; or
- any other regulatory or professional body with a lawful role.

Where a report is required under applicable Panamanian law, the School will ensure that it is made to the competent authority within the required timeframe.

Internal notification to Inspired Education, or consultation with School leaders, does not replace or delay any statutory reporting obligation.

English statutory reporting mechanisms will not be treated as directly applicable unless a separate legal basis exists.

18. Safer Recruitment, Supervision of Staff and Visitors

The School is committed to safer recruitment and to preventing unsuitable adults from gaining access to children.

Recruitment procedures are set out in the Safer Recruitment Policy and include appropriate:

- identity verification;
- employment-history checks;
- qualification checks;
- references;
- criminal-record or police checks;
- overseas checks;
- safeguarding scrutiny;
- suitability assessments; and
- recording of required recruitment information.

Checks will reflect Panamanian legal requirements, Inspired Education requirements and recognised British safer-recruitment practice.

The School maintains a central record of required recruitment and safeguarding checks.

Volunteers, Contractors and Third Parties

The level of checking and supervision will be determined according to:

- the nature of the role;
- frequency of contact with children;
- whether contact is supervised;
- opportunity for unsupervised access;
- nature of the activity; and
- relevant legal and safeguarding requirements.

Visitors

Visitors who have not completed the School's required safeguarding checks must remain appropriately supervised.

The School operates a visitor-identification system to distinguish between adults who may and may not move around the campus unsupervised.

No visitor-identification system replaces professional vigilance.

External Speakers and Providers

External speakers and providers will be appropriately checked and supervised.

The School retains responsibility for safeguarding pupils during School-authorised activities delivered by external providers.

Where third-party organisations use the School premises to provide activities for children, appropriate safeguarding expectations will be established contractually or through written agreements.

Mobile Devices and Photography

Staff use of personal devices and photography must comply with:

- the Staff Code of Conduct;
- Mobile Phones and Personal Smart Devices Policy;

- Online Safety Policy; and
- Data Protection Policy.

Unauthorised photography or recording of pupils is prohibited.

Additional EYFS Safeguarding Requirements

Staff working within EYFS must not use personal mobile phones or other personal devices to photograph or record children. Only authorised school-owned devices may be used, with appropriate parental consent. Images and recordings must be stored securely on authorised School systems and subject to appropriate checks.

At least one member of staff with current paediatric first-aid training must be present and available whenever children are attending the EYFS provision. A suitably trained member of staff must accompany EYFS children on outings.

Staff working in EYFS must not be under the influence of alcohol or any substance that may impair their ability to care for children. Medication must be stored securely and out of children's reach.

19. Training

All Staff

Every member of staff must receive safeguarding and child-protection training at induction.

All staff, including those who do not work directly with children, are required by the School to read at least **Part One of Keeping Children Safe in Education 2026**.

The KCSIE overview, School handout or other summary materials may support staff understanding but do not replace Part One.

Staff safeguarding training will be updated regularly, with formal updates at least annually and additional updates whenever required.

Training includes:

- this policy;
- the identity and role of the DSL and DDSL;
- the Staff Code of Conduct;
- child-on-child abuse;
- allegations and low-level concerns;
- whistleblowing;
- online safety;
- filtering and monitoring;
- safeguarding implications of generative AI;
- sharing nudes and semi-nudes;
- attendance-related safeguarding;
- abuse, neglect and exploitation;
- modern slavery and trafficking;
- financial exploitation;
- harmful sexual behaviour;
- sexual harassment and sexual violence;
- domestic abuse;

- mental health;
- SEND and additional vulnerability;
- radicalisation and extremist influence;
- responding to disclosures;
- recording and information sharing; and
- local referral arrangements in Panama.

Training records are maintained.

DSL and DDSL

The DSL and DDSL receive specialist safeguarding training appropriate to their responsibilities and update that training at least every two years.

Their knowledge and skills are refreshed at least annually and whenever significant safeguarding developments require it.

Teaching Pupils About Safeguarding

Pupils are taught how to keep themselves and others safe through:

- PSHE;
- Relationships Education and RSE;
- online-safety education;
- curriculum provision;
- assemblies;
- pastoral programmes; and
- age-appropriate safeguarding education.

Teaching addresses both online and offline risk and includes:

- healthy and respectful relationships;
- consent and boundaries;
- reporting concerns;
- trusted adults;
- bullying and discrimination;
- online relationships;
- image sharing;
- harmful content;
- misinformation and disinformation;
- generative AI;
- exploitation;
- personal safety; and
- how to access help.

Teaching will be adapted where necessary for pupils with SEND or other vulnerabilities.

20. Monitoring and Review

The DSL leads regular review of safeguarding procedures and implementation.

The policy is formally reviewed at least annually and earlier where required by:

- changes in Panamanian law;
- changes to BSO standards;
- revisions to KCSIE or other relevant guidance;
- changes to Inspired Education requirements;
- emerging safeguarding risks;
- serious incidents;
- safeguarding audits;
- lessons learned;
- pupil voice; or
- identified weaknesses in practice.

Safeguarding effectiveness will be evaluated using evidence including:

- safeguarding records and trends;
- referrals;
- child-on-child incidents;
- allegations and low-level concerns;
- attendance;
- bullying;
- online-safety incidents;
- filtering and monitoring;
- pupil surveys and focus groups;
- training compliance;
- safer recruitment audits; and
- external-agency feedback where available.

Actions arising from review will be recorded and monitored.

21. Record Keeping

All safeguarding concerns, discussions, decisions and reasons for decisions must be recorded.

Safeguarding records should contain:

- a clear and comprehensive summary of the concern;
- relevant factual information;
- the child's own words where appropriate;
- details of actions taken;
- details of referrals or advice received;
- decisions reached and reasons;
- follow-up actions; and
- outcomes.

Safeguarding concerns, actions, decisions and follow-up are **recorded and managed securely through iSAMS Wellbeing Manager**.

Records must be:

- accurate;

- factual;
- timely;
- secure;
- appropriately restricted; and
- retained in accordance with the School's Data Protection Policy and records-retention requirements.

Information Sharing

Effective information sharing is essential to safeguarding.

Data protection must not be treated as a barrier to necessary and proportionate safeguarding information sharing where a child may be at risk.

Staff should:

- share information with the DSL promptly;
- share only information necessary for safeguarding purposes;
- ensure information is accurate where possible;
- consider the security of information being shared;
- record what has been shared, with whom and why; and
- seek advice where uncertain.

The School will share information with relevant external agencies where it is lawful, necessary and proportionate to safeguard a child.

The safety and welfare of the child is the central consideration.

Transfer of Safeguarding Records

Where a pupil transfers to another school, the DSL will arrange for relevant child-protection records to be transferred securely, separately from the general pupil file and in accordance with applicable data-protection requirements.

The transfer should take place as soon as practicable and normally within five days for an in-year transfer or within the first five days of a new term. Confirmation of receipt will be obtained and recorded.

Appendix 1: Concerns About a Child – Guidance for Staff

1. Receiving a Disclosure

If a child makes a disclosure:

1. Listen carefully.
2. Remain calm.
3. Take the child seriously.
4. Do not investigate.
5. Do not ask leading questions.
6. Use open prompts such as "Tell me what happened", "Explain what you mean" or "Describe what happened next".
7. Do not ask the child to repeat their account unnecessarily.
8. Reassure the child that they have done the right thing by speaking.
9. Do not promise confidentiality.
10. Explain that information will only be shared with people who need to help.
11. Do not confront an alleged perpetrator.
12. Seek appropriate medical assistance if necessary.
13. Report to the DSL or DDSL immediately.
14. Record the concern promptly on **iSAMS Wellbeing Manager**.

Where a criminal offence may have occurred, staff must avoid questioning which could compromise an external investigation.

2. Recording a Concern

Records should include:

- pupil's name;
- date and time;
- context in which the concern arose;
- factual account of what was observed or disclosed;
- the child's own words wherever possible;
- action taken;
- person to whom the concern was reported; and
- name of the person making the record.

Opinion should be clearly distinguished from fact.

Original notes relevant to a safeguarding concern should be preserved where appropriate.

3. Physical Evidence

Staff must not:

- examine a child beyond what is professionally appropriate to their role;
- photograph injuries unless specifically authorised as part of an agreed safeguarding process;
- access or search personal devices without lawful authority and appropriate senior oversight;
- copy sexual imagery; or
- circulate evidence.

Potential evidence should be preserved and handled in consultation with the DSL and, where appropriate, police or relevant authorities.

4. Physical Intervention

Physical intervention or restraint may only be used where necessary to prevent an immediate risk of harm to the pupil or another person.

Any intervention must:

- be reasonable and proportionate;
- use the minimum force necessary;
- continue for the shortest possible period;
- never be used as punishment; and
- be reported and recorded in accordance with School procedures.

Staff must also comply with the School's approved procedures for physical intervention and restrictive practices, including any applicable requirements concerning reasonable force and seclusion.

Parents should normally be informed on the same day unless a safeguarding reason makes this inappropriate.

All physical intervention must comply with applicable Panamanian law.

Appendix 2: Dealing with Allegations of Child-on-Child Abuse

1. Principle

Child-on-child abuse is a safeguarding issue.

The School operates a zero-tolerance approach to abusive behaviour. Zero tolerance means that inappropriate behaviour will never be normalised, ignored or dismissed; it does not mean that every incident attracts the same disciplinary consequence.

Responses will be proportionate, child-centred and safeguarding-led.

2. Forms of Child-on-Child Abuse

Child-on-child abuse may include:

- bullying;
- cyberbullying;
- discriminatory bullying;
- abuse in intimate relationships;
- physical assault;
- sexual harassment;
- sexual violence;
- harmful sexual behaviour;
- coercive or controlling behaviour;
- misogynistic or misandrist abuse;
- forcing another person to engage in sexual activity;
- making or sharing nudes and semi-nudes;
- AI-generated or digitally altered sexual images;
- upskirting;
- hazing;
- exploitation; and
- online abuse.

3. Harmful Sexual Behaviour

Harmful sexual behaviour exists on a continuum from inappropriate or problematic behaviour through to abusive and violent behaviour.

Staff should consider:

- age;
- developmental stage;
- consent;
- coercion;
- power imbalance;
- frequency;
- pattern;
- intent;
- vulnerability;

- impact on others; and
- whether the behaviour is escalating.

Early intervention may prevent more serious harm.

4. Initial Response

Staff receiving a report must:

- listen;
- reassure;
- avoid judgement;
- avoid promises of confidentiality;
- record the report;
- notify the DSL immediately; and
- avoid undertaking their own investigation.

The child reporting harm should be reassured that:

- they are being taken seriously;
- they will be supported;
- the abuse is not their fault; and
- they have not created a problem by reporting it.

5. DSL Assessment

The DSL will consider:

- wishes and feelings of the child;
- nature of the alleged behaviour;
- ages and developmental stages;
- potential power imbalance;
- whether behaviour forms part of a pattern;
- whether a crime may have been committed;
- risk of further harm;
- risk to other pupils;
- online elements;
- location and timing;
- relevant vulnerabilities; and
- whether external referral is necessary.

An immediate risk and needs assessment will normally be completed for sexual violence and considered for other serious child-on-child concerns.

6. Support

Appropriate support will be considered for:

- the child who has experienced harm;
- the child alleged to have caused harm;
- other affected pupils;

- witnesses; and
- the wider peer group where necessary.

A child who has caused harm may also have safeguarding needs.

7. Disciplinary Action

Safeguarding action and disciplinary action are separate processes.

Behaviour consequences may be appropriate, but must not replace safeguarding assessment.

8. Sexual Images

Every incident involving nude or semi-nude imagery involving a person under 18 must be treated as a safeguarding matter.

This includes imagery that is:

- self-generated;
- created by another person;
- consensually shared;
- non-consensually shared;
- digitally manipulated; or
- wholly or partly generated using artificial intelligence.

Staff must not routinely:

- view;
- copy;
- print;
- save;
- forward; or
- share such images.

The detailed procedure in the School's Sharing Nudes and Semi-Nudes Policy must be followed.

9. External Referral

Where there is a risk of significant harm, suspected criminal conduct or a need for specialist intervention, the DSL will consider referral to SENNIAF, police or other appropriate services in Panama.

Appendix 3: Raising allegations and low-level concerns

Key contact information

Below is the key contact information you may need to raise an allegation or low-level concern under this policy.

DSL Zoe Pett	+507 282 3300 zoe.pett@kings.education
Head of School Robert Pett	+44 7740 936 771 robert.pett@kings.education
Regional CEO Eleanor Prescott	+51 953 443 895 Eleanor.Prescott@inspirededu.com
Global Head of Safeguarding Jez Prior	+44 7823 468657 jez.Prior@inspirededu.com

Purpose and application

Purpose: King's College School, Panama takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by King's College School, Panama.

Application: the Policy applies to all adults working in or on behalf of King's College School, Panama (whether on a paid or unpaid basis), including governors, supply staff, trainee teachers, volunteers and contractors (**Staff**).

Other adults: although this policy directly relates to those who work for King's College School, Panama, King's College School, Panama recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for King's College School, Panama. Should concerns be raised about people who are not Staff or pupils, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

Key Staff duties

Staff behaviour: all Staff must comply with King's College School, Panama's Code of Conduct which sets out appropriate and expected standards of behaviour.

Duty to report: as a member of Staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a member of Staff or any other adult, which could include adults not employed by King's College School, Panama. This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent or another adult, or as a result of checks or information brought to your attention.

Duty to self-refer: you must refer yourself to the Head where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and/or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

A culture of sharing: all Staff have a positive obligation to support King's College School, Panama's culture of openness and sharing without fear of reprisal.

What needs to be reported?

Reporting all concerns: all concerns must be raised whether they are considered to be "low-level" concerns or conduct which may meet the harm threshold.

Low-level concerns: a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and/or the Staff Code of Conduct, whether inside or outside work. No concern is too small or minor to raise under this policy.

Concerns that meet the harm threshold: allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside King's College School, Panama which creates a transferable risk.

Definition of harm: harm should be understood in its ordinary safeguarding sense and includes ill-treatment or impairment of a child's physical or mental health or development. Harm may be physical or non-physical and can include sexual abuse, emotional abuse and the impact of seeing, hearing or experiencing the ill-treatment of another person.

The definitions and harm threshold in *Keeping Children Safe in Education 2026* are used by King's College School, Panama as a safeguarding benchmark. Any legal response or external referral will be determined in accordance with applicable Panamanian law.

How to raise concerns and allegations

Duty of the DSL to refer concerns to the Head: the Head remains the ultimate decision-maker in respect of all low-level concerns. Save for cases involving the Head, the DSL must therefore promptly report any concern raised with them to the Head. Wherever possible the DSL must speak to the Head in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Head in person about the concern, the DSL must email the Head with a summary of the concern on the same day the concern is raised.

Concerns about Staff: where you have a concern about the conduct of a member of Staff, other than the Head, whether this is a low-level concern or an allegation of harm that may meet the harm threshold, you must raise this immediately with the Head.

Concerns involving the Head and conflicts of interest: where you identify a concern about the Head, you must report the matter immediately to the Regional CEO and/or Global Head of Safeguarding without first notifying the Head.

Concerns involving governance: where you identify a concern about an individual exercising governance or proprietorial oversight, you must report the matter immediately to the Regional CEO or Global Head of Safeguarding, as appropriate. Where either is the subject of the concern, the matter must be referred to an alternative appropriate senior Inspired Education leader.

Concerns involving individuals/organisations using School premises: where King's College School, Panama receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children, for example community groups, sports associations or service providers that run extra-curricular activities, it will follow its own safeguarding policies and procedures and involve the appropriate Panamanian safeguarding or law-enforcement authority where required.

Reports to the DSL: if it is not possible for you to make a report to the Head, Regional CEO or Global Head of Safeguarding, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Regional CEO or Global Head of Safeguarding.

2. King's College School, Panama's response to concerns and allegations

Appropriate action: King's College School, Panama will ensure that appropriate action is taken to address concerns that are raised under this policy.

Assessing concerns: the Head, or if the concern relates to the Head, the Regional CEO and/or Global Head of Safeguarding, will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, Head and relevant Inspired Education safeguarding leaders are trained to assess concerns, and to record and address them appropriately.

Low-level concerns: if King's College School, Panama determines the concern is a low-level concern, then King's College School, Panama will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking King's College School, Panama's capability or disciplinary procedures.

Borderline cases: the Head, or if the concern relates to the Head, the Regional CEO and/or Global Head of Safeguarding, may take advice from the Global Head of Safeguarding or other appropriate safeguarding or legal advisers in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold.

Responding to an allegation that may meet the harm threshold: where an allegation is made that may meet the harm threshold, King's College School, Panama will take advice from the Global Head of Safeguarding, the Regional CEO and Human Resources.

Supply staff, trainee teachers and externally employed staff: where an allegation relates to a supply member of staff, trainee teacher, contractor or other adult employed or placed by another organisation, King's College School, Panama will work with the relevant agency, employer or training provider in managing the allegation. The School remains responsible for safeguarding pupils and for establishing and recording the facts relating to what occurred within the School or during School activities. The relevant employing or training organisation will be involved in decisions relating to the individual's employment, placement or professional status.

Informing the child's parents/carers where appropriate: the Case Manager will agree when and how the parents or carers of the child/children involved will be informed of the allegation if they do not already know of it.

Involvement of external agencies: SENNIAF, the police or other appropriate Panamanian authorities may need to be involved. Decisions will be taken on a case-by-case basis, with guidance from the Global Head of Safeguarding, the Regional CEO and Human Resources.

3. Record keeping

Records of low-level concerns: low-level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low-level concerns, including those that have not been addressed formally under King's College School, Panama's procedures, will also be stored securely in a central file (**Concerns and Allegations Record**).

Recording low-level concerns: the Concerns and Allegations Record will set out the name of the individual involved, if an individual is named, a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome/result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous King's College School, Panama will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.

Records of allegations that may meet the harm threshold: details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken in response to the allegation.

Storage and security of Concerns and Allegations Record: the Concerns and Allegations Record will be stored securely in accordance with Human Resources advice and the School's Data Protection and records-management requirements.

Malicious or false low-level concerns and allegations: details of low-level concerns and allegations found to be malicious or false will be managed in accordance with applicable safeguarding guidance, employment procedures, data-protection requirements and records-retention requirements.

Retention of records: information stored on staff personnel files about low-level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained in accordance with King's College School, Panama's information and records-retention requirements, applicable Panamanian data-protection law and relevant safeguarding requirements. Records will be retained for sufficient periods to enable the School to respond appropriately to historic safeguarding concerns or allegations involving current or former members of Staff.

4. References

Low-level concerns: low-level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under King's College School, Panama's disciplinary or capability policies and procedures and it is otherwise appropriate and lawful to disclose them.

Allegations that meet the harm threshold: allegations that meet the harm threshold will be disclosed in a reference where the allegation was found to be substantiated and where disclosure is appropriate and lawful. King's College School, Panama will not disclose information about allegations that were found to be false, unfounded, unsubstantiated or malicious.

5. Questions

Contact: please contact Jez Prior if you have any questions about this policy.

Appendix 4: Forms of Abuse, Neglect and Specific Safeguarding Risks

1. Abuse, Neglect and Exploitation

Safeguarding concerns rarely occur in isolation. Multiple forms of harm may overlap.

Children can experience harm:

- within the home;
- outside the home;
- within School;
- in the community;
- within relationships;
- online; and
- across several environments simultaneously.

2. Physical Abuse

Physical abuse may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm.

Physical harm may also occur where an adult fabricates or deliberately induces illness.

3. Emotional Abuse

Emotional abuse is persistent emotional maltreatment likely to cause serious adverse effects on a child's emotional development.

It may include:

- persistent criticism;
- belittling;
- name-calling;
- humiliation;
- rejection;
- silencing;
- making a child feel worthless or inadequate;
- inappropriate expectations;
- overprotection;
- preventing normal social interaction;
- witnessing ill-treatment of others;
- serious bullying;
- coercion; or
- exploitation.

4. Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening.

It may involve:

- physical contact;
- sexual assault;
- non-contact sexual activity;
- involving children in sexual imagery;
- exposing children to sexual activity;
- sexualised online activity;
- grooming; or
- technology-facilitated abuse.

Sexual abuse can be perpetrated by adults or children.

5. Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs.

It may include failure to provide:

- food;
- clothing;
- shelter;
- protection;
- adequate supervision;
- medical care;
- emotional care; or
- appropriate support.

6. Exploitation

Children may be exploited sexually, criminally or financially.

Exploitation may involve an individual, group, network or organised criminal structure taking advantage of a power imbalance to coerce, manipulate, deceive or control a child.

A child cannot consent to their own exploitation.

Children who have been coerced into criminal behaviour should have their vulnerabilities and potential victim status considered.

7. Modern Slavery and Trafficking

Modern slavery and trafficking are forms of abuse and exploitation.

Concerns that a child may have been trafficked, controlled, transported, harboured or exploited must be reported to the DSL immediately and referred through appropriate Panamanian safeguarding and law-enforcement arrangements.

8. Financial Exploitation

Financial exploitation can include coercing, manipulating or deceiving a child into:

- transferring money;
- allowing access to bank accounts;
- participating in fraud;
- moving criminal funds;
- taking on debt;
- making financial transactions; or
- surrendering money or property.

Financial exploitation may overlap with criminal or sexual exploitation.

9. Child-to-Parent or Carer Abuse

Children can cause significant harm to parents, carers or other family members.

Where this occurs, safeguarding assessment should consider:

- risk to all family members;
- the needs of the child;
- possible previous victimisation or trauma;
- coercion or exploitation;
- mental-health needs; and
- appropriate external support.

10. Domestic Abuse and Teenage Relationship Abuse

Children may:

- experience domestic abuse directly;
- see or hear domestic abuse;
- experience its effects; or
- experience abuse within their own intimate relationships.

Teenage relationship abuse may include:

- physical abuse;
- sexual abuse;
- emotional abuse;
- coercive control; and
- stalking.

11. Children Absent from Education

Repeated or prolonged absence can be a safeguarding warning sign.

It may indicate:

- abuse;
- neglect;
- exploitation;
- mental-health difficulties;
- family crisis;

- substance misuse;
- trafficking;
- coercion;
- serious violence; or
- other safeguarding concerns.

Attendance concerns must therefore be considered through a safeguarding lens as well as an educational one.

Where a pupil is absent for five consecutive days, has frequent unjustified absences or appears to have disengaged from education, the Head of School and DSL will ensure that the School follows the relevant procedures under Article 162 of Law 285 of 2022. This includes contacting parents or carers, establishing the reasons for absence and involving the appropriate Panamanian authorities where legally required. All relevant actions and decisions must be recorded.

12. Serious Violence and Criminal Exploitation

Possible indicators include:

- increased absence;
- sudden friendship changes;
- association with older individuals;
- decline in academic performance;
- unexplained injuries;
- unexplained money or possessions;
- substance misuse;
- self-harm;
- significant changes in wellbeing; and
- threats or coercion.

13. Cybercrime

Cybercrime includes criminal activity using computers or networks.

Children with strong technological skills may become involved intentionally or unintentionally in:

- hacking;
- malware;
- denial-of-service attacks;
- fraud;
- unauthorised access; or
- other cyber-dependent offences.

Concerns should be managed as safeguarding matters as well as potential disciplinary matters.

14. Honour or Faith-Based Abuse

Abuse associated with perceived honour, faith or cultural expectations is abuse regardless of motivation.

This can include:

- FGM;
- forced marriage;

- coercive control;
- threats;
- violence; and
- family or community pressure.

Concerns must be reported immediately to the DSL.

Where FGM, forced marriage or related abuse is suspected, the School will follow applicable Panamanian safeguarding and criminal-law requirements and involve SENNIAF or police where appropriate.

UK-specific mandatory reporting mechanisms do not create statutory reporting duties for staff in Panama.

15. Radicalisation and Extremist Influence

Staff should be alert to children who may be vulnerable to extremist influence or radicalisation.

Concerns may involve:

- changes in behaviour;
- extremist material;
- online grooming;
- isolation;
- expressions supporting violence;
- involvement with extremist individuals or groups; or
- attempts to recruit others.

The UK Prevent duty does not create a statutory duty for the School in Panama.

The School nevertheless adopts the safeguarding principle that vulnerability to radicalisation should be recognised and responded to through safeguarding processes and appropriate local authorities.

16. Online Safety

Technology is a significant component of safeguarding risk.

Online risks are considered through four broad categories.

Content

Exposure to harmful or inappropriate material, including pornography, sexual or violent content, misogyny, racism, self-harm and suicide content, extremist material, misinformation, disinformation, conspiracy theories and AI-generated harmful material.

Contact

Harmful interaction with other people, including grooming, exploitation, coercion, impersonation, peer pressure and adults posing as children.

Conduct

A child's own behaviour creating or increasing risk, including bullying, sharing sexual imagery, harmful communication, harassment, generating or manipulating sexual images, misuse of artificial intelligence and unsafe sharing of personal information.

Commerce

Commercial and financial risks including gambling, scams, phishing, inappropriate advertising, financial exploitation and fraudulent transactions.

Generative artificial intelligence may amplify risks across all four categories.

17. Sharing Nudes and Semi-Nudes

Nudes and semi-nudes include photographs, videos, livestreams and other visual content.

Images may be:

- taken by the child;
- taken by another person;
- altered digitally; or
- partly or wholly generated using artificial intelligence, including deepfakes or deep nudes.

All such incidents involving a child require a safeguarding response.

Staff must follow the School's Sharing Nudes and Semi-Nudes Policy.

18. SEND, Disability and Medical Conditions

Children with SEND, disabilities or medical conditions may face additional safeguarding barriers.

Staff must be alert to:

- assumptions that changes in behaviour, mood or injury are explained by a condition;
- communication difficulties;
- increased isolation;
- disproportionate bullying;
- difficulty interpreting online content;
- dependency on adults; and
- increased vulnerability to exploitation.

Appropriate communication and pastoral support must be provided.

19. Mental Health

Mental-health concerns can sometimes indicate that a child has experienced or is at risk of abuse, neglect or exploitation.

Possible indicators include:

- significant behavioural change;
- withdrawal from social situations;
- ongoing sleep difficulties;
- marked changes in mood;

- self-harm;
- signs of an eating disorder;
- suicidal ideation; or
- concerns relating to suicide.

Staff are well placed to notice changes, listen, report concerns and help pupils access support.

Staff must not attempt to diagnose mental-health conditions unless professionally qualified to do so.

Safeguarding concerns must be reported to the DSL.

20. Children Questioning Gender

A child questioning their gender may require sensitive, thoughtful and individualised support.

Questioning gender is not, in itself, evidence that a child is at risk of harm.

However, staff should remain professionally curious about the child's wider wellbeing and any associated safeguarding concerns, including:

- bullying;
- discrimination;
- family difficulties;
- peer relationships;
- mental-health needs;
- online influences; and
- other vulnerabilities.

The School will not adopt a one-size-fits-all response.

Staff should not independently initiate or make significant changes relating to a child's social transition.

Where a child or parent raises such a request, it should be referred to the DSL and appropriate senior leaders so that the child's welfare, wishes, family circumstances, safeguarding needs and any relevant professional advice can be considered.

Staff must not promise confidentiality.

Parents will normally be involved unless there is a specific safeguarding reason why doing so may place the child at risk.

Records relevant to safeguarding must be accurate and managed in accordance with applicable Panamanian law and School data-protection requirements.

All pupils are entitled to dignity, safety and protection from bullying, harassment and discrimination.

Appendix 5: Panama Safeguarding Referral and External Agency Arrangements

1. Principle

King's College School Panama applies British safeguarding principles within the legal and child-protection framework of Panama.

The School does not describe English agencies or statutory thresholds as though they operate in Panama.

2. Immediate Danger

Where a child or another person is in immediate danger:

Call 911.

The DSL, DDSL or Head of School must be informed as soon as practicable.

3. Child-Protection Referral

Where a child is suffering or may be at risk of abuse, neglect, exploitation or another violation of their rights, the DSL and Head of School will ensure that appropriate safeguarding action and any mandatory external reporting are undertaken without delay.

In accordance with Article 104 of Law 285 of 2022, threats or violations of children's rights must be communicated to the competent authorities within 24 hours.

Where applicable, the School will also fulfil the specific obligations relating to reporting abuse, suspected maltreatment and other child-protection concerns under Articles 160 and 221 of Law 285 of 2022.

The appropriate reporting authority will be determined according to the nature of the concern and applicable Panamanian law. Internal notification to the DSL, Head of School or Inspired Education does not replace any mandatory external report. Where there is concern that a child is suffering or may be at risk of harm, the DSL will consider referral to:

SENNIAF – National Secretariat for Children, Adolescents and the Family

Hotline for reporting violations of rights: 6378-3466
Psychological Assistance Line: 6378-7876
Main Office: +507 504-4052 / 504-3983 / 504-0080

National Police: 104
Emergency Services: 911

Where an incident involves suspected criminal conduct or triggers a statutory duty to notify law-enforcement or prosecutorial authorities, the School will make the required report to the competent authority without delay.

4. Referral Principles

The School will:

- act promptly;
- place the child's safety first;
- record decisions;
- share relevant information lawfully and proportionately;
- preserve relevant evidence;
- cooperate with competent authorities;
- maintain appropriate support for the child; and
- review risk following referral.

5. Parental Involvement

Parents will normally be involved unless doing so may:

- increase risk to the child;
- compromise an investigation;
- expose another person to harm; or
- otherwise conflict with safeguarding advice from competent authorities.

6. International and Cross-Border Concerns

Where safeguarding concerns involve conduct, family circumstances or potential offences in another jurisdiction, the School may seek appropriate professional or legal advice and cooperate with competent authorities in the relevant jurisdiction.

The welfare and immediate protection of the child remain the overriding considerations.