



## St. Stephen's Junior School Child Protection Policy

**This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.**

Date written: September 2025

Date agreed and ratified by Governing Body: September

Date of Review: September 2026

All key changes have been made from KCSIE 2025.

**This policy and online safety policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.**

### **Key Contacts**

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## Contents

<b>What to do if you have a welfare concern in St Stephens Junior School .....</b>	<b>3</b>
<b>1. Child Focused Approach to Safeguarding .....</b>	<b>Error! Bookmark not defined.</b>
1.1 Introduction.....	Error! Bookmark not defined.
1.2 Policy context.....	Error! Bookmark not defined.
1.3 Definition of safeguarding .....	Error! Bookmark not defined.
1.4 Related safeguarding policies .....	Error! Bookmark not defined.
1.5 Policy compliance, monitoring and review .....	Error! Bookmark not defined.
<b>2. Key Responsibilities .....</b>	<b>Error! Bookmark not defined.</b>
2.1 Governance and leadership.....	Error! Bookmark not defined.
2.2 Designated Safeguarding Lead (DSL) .....	Error! Bookmark not defined.
2.3 Members of staff .....	Error! Bookmark not defined.
2.4 Children.....	Error! Bookmark not defined.
2.5 Parents and carers.....	Error! Bookmark not defined.
<b>3. Child Protection Procedures .....</b>	<b>Error! Bookmark not defined.</b>
3.1 Recognising indicators of abuse, neglect and exploitation .....	Error! Bookmark not defined.
3.2 Responding to child protection concerns .....	Error! Bookmark not defined.
3.3 Child Protection Records .....	Error! Bookmark not defined.
3.4 Transferring Child Protection Files .....	15
3.5 Multi-agency working.....	Error! Bookmark not defined.
3.6 Confidentiality and information sharing.....	Error! Bookmark not defined.
3.7 Complaints .....	Error! Bookmark not defined.
<b>4. Specific Safeguarding Issues.....</b>	<b>Error! Bookmark not defined.</b>
4.1 Child-on-child abuse.....	Error! Bookmark not defined.
4.2 Sexual violence and sexual harassment.....	Error! Bookmark not defined.
4.3 Nude and/or semi-nude image sharing by children .....	Error! Bookmark not defined.
4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) .....	<b>Error! Bookmark not defined.</b>
4.5 Serious violence.....	Error! Bookmark not defined.
4.6 Modern Slavery and the National Referral Mechanism (NRM).....	24
4.7 So-called Honour Based Abuse (HBA) .....	Error! Bookmark not defined.
4.8 Preventing radicalisation .....	Error! Bookmark not defined.
4.9 Cybercrime .....	Error! Bookmark not defined.
4.10 Domestic abuse .....	Error! Bookmark not defined.
4.11 Mental health .....	Error! Bookmark not defined.
4.12 Bruising in non-mobile children (remove if not applicable to school/college type) .....	27
<b>5. Supporting Children Potentially at Greater Risk of Harm .....</b>	<b>Error! Bookmark not defined.</b>

5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND) .	<b>Error! Bookmark not defined.</b>
5.2 Children requiring mental health support .....	<b>Error! Bookmark not defined.</b>
5.3 Children who are absent from education .....	<b>Error! Bookmark not defined.</b>
5.4 Children attending alternative provision .....	29
5.5 Elective Home Education (EHE) .....	29
5.6 Children who may benefit from Early Help	
	<b>Error! Bookmark not defined.</b>
5.7 Children who need a social worker (child in need and child protection plans) ...	<b>Error! Bookmark not defined.</b>
5.8 Looked after children (including kinship care), previously looked after children and care leavers .....	<b>Error! Bookmark not defined.</b>
5.9 Children who are privately fostered .....	31
5.10 Children who are Lesbian, Gay, Bisexual, or Gender Questioning...	<b>Error! Bookmark not defined.</b>
<b>6. Online Safety .....</b>	<b>Error! Bookmark not defined.</b>
6.1 Generative Artificial Intelligence (AI) .....	33
6.2 Mobile and Smart Technology .....	<b>Error! Bookmark not defined.</b>
6.3 Appropriate filtering and monitoring on school/college devices and networks ...	<b>Error! Bookmark not defined.</b>
6.3.1 Responsibilities.....	<b>Error! Bookmark not defined.</b>
6.3.2 Decision making and reviewing our filtering and monitoring provision .....	<b>Error! Bookmark not defined.</b>
6.3.3 Appropriate filtering.....	<b>Error! Bookmark not defined.</b>
6.3.4 Appropriate monitoring.....	<b>Error! Bookmark not defined.</b>
6.4 Information security and access management .....	<b>Error! Bookmark not defined.</b>
6.5 Remote/Online learning .....	<b>Error! Bookmark not defined.</b>
6.6 Online Safety Training for Staff .....	<b>Error! Bookmark not defined.</b>
6.7 Educating pupils/students.....	<b>Error! Bookmark not defined.</b>
6.8 Working with parents/carers .....	<b>Error! Bookmark not defined.</b>
<b>7. Staff Engagement and Expectations .....</b>	<b>Error! Bookmark not defined.</b>
7.1 Staff awareness, induction and training .....	<b>Error! Bookmark not defined.</b>
7.2 Safer working practice .....	<b>Error! Bookmark not defined.</b>
7.3 Supervision and support .....	<b>Error! Bookmark not defined.</b>
<b>8. Safer Recruitment and Allegations Against Staff .....</b>	<b>Error! Bookmark not defined.</b>
8.1 Safer recruitment and safeguarding checks.....	<b>Error! Bookmark not defined.</b>
8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors .....	<b>Error! Bookmark not defined.</b>
8.2.1 Concerns that meet the 'harm threshold' .....	<b>Error! Bookmark not defined.</b>
8.2.2 Concerns that do not meet the 'harm threshold' .....	<b>Error! Bookmark not defined.</b>
8.3 Safe Culture.....	<b>Error! Bookmark not defined.</b>

9. Opportunities to Teach Safeguarding ..... Error! Bookmark not defined.

10. Physical Safety ..... Error! Bookmark not defined.

10.1 Use of 'reasonable force' ..... Error! Bookmark not defined.

10.2 The use of school/college premises by other organisations ..... Error! Bookmark not defined.

10.3 Site security ..... Error! Bookmark not defined.

11. Local Support ..... Error! Bookmark not defined.

**Appendix 1: Categories of Abuse** ..... Error! Bookmark not defined.

Appendix 2: Support Organisations and Resources **Error! Bookmark not defined.**

## What to do if you have a welfare concern

### Why are you concerned?

- Something a child has said, for example, an allegation of harm
- Child's appearance; may include frequent or unexplained injuries/ marks/bruises and/or dress
- Behaviour change(s)
- Witnessed concerning, harmful or inappropriate behaviour
  -

### Act immediately and record your concerns: If urgent, speak to a DSL first

Follow the [school](#) procedure ([insert/amend details](#))

- Reassure the child
- Clarify any concerns using open questions, if necessary (**TED**: Tell, Explain, Describe)
- Record facts and not opinions and use child's own words on My Concern
- Seek support for yourself as required from DSL

### Inform the Designated Safeguarding Lead(s)

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent [Request for Support to the Front Door Service via the portal](#) or call the Police on 999.
- If no immediate risk of harm, provide internal support and/or refer to other agencies in line with [Kent Safeguarding Support Level Guidance and KSCMP procedures](#), as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO Service, or make a Request for Support via the [Front Door Service Portal](#).
- If we believe a child may be in need of support but are unclear whether to refer, a [no-named consultation](#) can be sought from the Front Door Service via **03000 411 111**
- If support is required out of working hours, the [school/college](#) will contact the Out of Hours Service via **03000 41 91 91**.

### If you are unhappy with the response:

#### DSLs/Staff:

- Follow [school/college](#) whistleblowing procedures ([link or information on how to access](#))
- Follow Kent [safeguarding partnership escalation](#) procedures.

#### Pupils/Students or Parents:

- Follow [school/college](#) complaints procedures ([link or information on how to access](#))

Record decision making and action taken in the [pupil/student's](#) child protection file

### Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback, and how you will record

**Review and request further support if necessary.**



At all stages, the child's circumstances will be kept under review

1. The DSL/staff will request further support if required to ensure the **child's safety is paramount**

## 1.1 Introduction

- St Stephen's Junior School recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, trustees, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- St Stephen's Junior School believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Staff working with children at St Stephen's Junior School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend the school but may also apply to other children connected to the school for example, siblings, or younger members of staff (under 18s) or children on student/work placements.
- St Stephen's Junior School recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- St Stephens Junior School recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
  - **Prevention**
    - positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
  - **Protection**
    - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.

- **Support**
  - for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
- **Collaboration:**
  - with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding
- The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2025.

## 1.2 Policy Context

### Statutory Framework

This policy has been developed in accordance with the statutory guidance **Keeping Children Safe in Education (KCSIE) 2025** and **Working Together to Safeguard Children (2023)**.

**Keeping Children Safe in Education (2025) is statutory guidance**, and this school will comply with its requirements at all times. Where this policy refers to other guidance, this does not override the statutory duty placed on schools and colleges.

This policy should be read in conjunction with:

- KCSIE 2025 (all staff must read Part One; DSLs and senior leaders must read the document in full)
- Kent and Medway Safeguarding Children Multi-Agency Partnership (KSCMP) Procedures
- The Education Act 2002 (Section 175)
- The Children Acts 1989 and 2004

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

- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- St Stephen's junior school will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.

## 1.3 Definition of Safeguarding

- In line with KCSIE 2025, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - protecting children from maltreatment
  - providing help and support to meet the needs of children as soon as problems emerge
  - preventing impairment of children's mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
  - taking action to enable all children to have the best outcomes.
  - promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Child-on-child abuse
  - Children with family members in prison
  - Children missing or absent from education
  - Child missing from home or care
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - Contextual safeguarding (risks outside the family home)
  - County lines and gangs
  - Domestic abuse
  - Drugs and alcohol misuse
  - Fabricated or induced illness
  - Faith abuse
  - Gender based abuse and violence against women and girls
  - Hate
  - Homelessness
  - Human trafficking and modern slavery
  - Mental health
  - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
  - Online safety
  - Preventing radicalisation and extremism
  - Private fostering
  - Relationship abuse
  - Serious violence
  - Sexual violence and sexual harassment
  - So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage – it is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used
  - Upskirting

(Also see Part One and Annex B within ‘Keeping Children Safe in Education’ 2025)

#### 1.4 Related Safeguarding Policies

- This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
-

- Behaviour policy, including the use of reasonable force and screening/ searching and confiscation in schools
- Online safety and social media
- Anti-bullying
- Data protection and information sharing
- Relationship and Sex Education (RSE)
- Health and safety, including plans for school reopening
- Attendance
- Complaints policy
- Confidentiality
- Risk assessments (e.g. school trips, use of technology, school re-opening)
- Managing allegations against staff
- Staff behaviour policy/code of conduct, including Acceptable Use of Technology Policies (AUP)
- Safer recruitment
- Whistleblowing
- Equality
- First aid and accidents, including medication and managing illness, safer eating and allergies, health and safety, and infection
- First Aid and Supporting pupils with medical conditions, Children with health needs that cannot attend school
- RSE policy
- Child in care
- Risk assessments

Also see DFE policy - What to do if a child is being abused- 2015

#### **Supporting Guidance (to be read and followed alongside this document)**

- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - [Safer Recruitment Consortium](#)
- [What to do if you are worried a child is being abused](#)

These documents can be found on office 365, available to all staff.

#### **1.5 Policy Compliance, Monitoring and Review**

- St Stephen's Junior School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE 2025 as appropriate. This is available in the staff room.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website: [www.ststephensjuniorschool.co.uk/](http://www.ststephensjuniorschool.co.uk/)
- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.

- The Designated Safeguarding Leads and Headteacher will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

## 2. Key Responsibilities

### 2.1 Governance and Leadership

- The trustee board and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The trustee board have regard to the KCSIE 2025 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The trustee board and leadership team will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The trustee body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
  - This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
  - For further information about our approaches to equality, diversity, and inclusion, please access our schools' policies – Equality statement which is available on our website.
- The trustee board and headteacher will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The governing body/proprietor and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The school has a nominated trustee for safeguarding. The nominated trustee will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The trustee board and leadership team will ensure that the DSLs are supported in their role and are provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The Headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the governing body are understood, and followed by all staff.

### 2.2 Designated Safeguarding Lead (DSL)

- The school has appointed Laura Cutts and Sarah Heaney(Headteachers) as the Designated Safeguarding Leads (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence. These are Jo Sazant (SENCO), Karyn Taylor (Behaviour Lead), Richard May and Ruth Gough (Extended Schools Manager)
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.

## 2.2 Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection across the school. This role carries **ultimate accountability** for safeguarding systems and decision-making.

The DSL's responsibilities include:

- Managing and overseeing all child protection concerns and referrals
- Acting as the main point of contact with external agencies, including Children's Social Care, the Police, and the Local Authority Designated Officer (LADO)
- Ensuring that safeguarding concerns are **recorded accurately, securely, and promptly**
- Providing advice, support and supervision to staff
- Ensuring that staff receive appropriate safeguarding training and updates
- Promoting a culture of safeguarding, professional curiosity and vigilance
- Overseeing online safety, including filtering and monitoring arrangements
- Ensuring safeguarding records are transferred securely when pupils move schools

The DSL will be appropriately trained and will undertake **refresher training at least every two years**. Deputy DSLs will be trained to the **same standard** and will support the DSL in carrying out their duties.

The DSL (or a trained deputy) will always be available during school hours.

## 2.3 Members of Staff

- Our staff play a particularly important role in safeguarding as they are in a position to observe changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

- All members of staff have a responsibility to:
  - Provide a safe environment in which children can learn.
  - be alert to any issues of concern in a child's life at home or elsewhere.
  - Be aware of the indicators of abuse and neglect and exploitation so that they can identify cases of children who may need help or protection.
  - Know what to do if a child tells them that he or she is being abused or neglected or exploited and understand the impact abuse and neglect can have upon a child.
  - Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
  - Be prepared to identify children who may benefit from early help.
  - Understand the early help process and their role in it.
  - Understand the school safeguarding policies and systems.
  - Undertake and engage in regular and appropriate training which is regularly updated.
  - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - Know how to maintain an appropriate level of confidentiality.
  - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
  - Understand that not all children will feel comfortable being considered as a victim and described as such.
  - Consider the use of terminology of Victim, perpetrator and alleged perpetrator and appropriateness of their use.
  - Exercise professional curiosity with regards to all children and any potential safeguarding concerns.
  - Record safeguarding concerns in writing using My Concern.
  - act in line with our staff code of conduct/behaviour policy
  - Act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Staff at St Stephen's Junior School recognises that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
- Staff at St Stephen's Junior School will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff behaviour and pupil/student behaviour policies.

## 2.4 Children and Young People

- Children and young people (learners) have a right to:
  - Feel safe, be listened to, and have their wishes and feelings taken into account.
  - Confidently report abuse, neglect or exploitation knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
  - Contribute to the development of school safeguarding policies.
  - Receive help from a trusted adult.
  - Learn how to keep themselves safe, including online.

## 2.5 Parents and Carers

- Parents/carers have a responsibility to:
  - Understand and adhere the relevant school policies and procedures.
  - Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches.
  - Identify behaviours which could indicate that their child is at risk of harm including online.
  - Seek help and support from the school or other agencies.

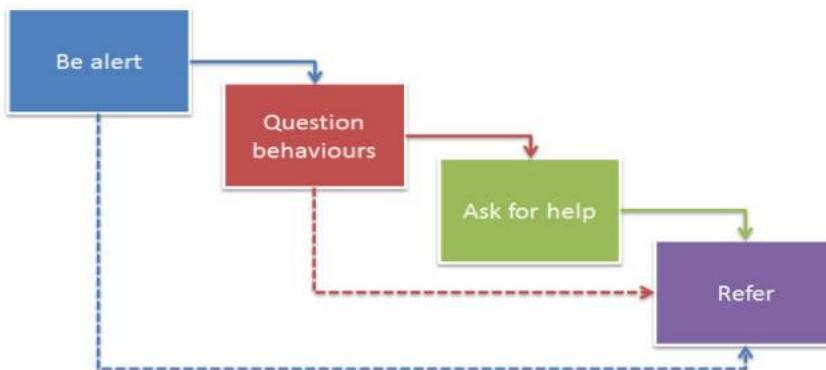
## 3. Child Protection Procedures

### 3.1 Recognising Indicators of Abuse and Neglect

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2023) and Keeping Children Safe in Education 2025. This is outlined locally within the [Kent Support Levels Guidance](#).
- St Stephen's Junior School recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect

For further information see Appendix 1.

- By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:



- St Stephen's Junior School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what

appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

- St Stephen's Junior School recognises abuse, neglect exploitation, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- St Stephen's recognises that some children will not feel ready to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead.
- Parental behaviors can indicate child abuse or neglect or exploitation, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online from people they may not know, as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- St Stephen's Junior School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- If deemed necessary by the headteacher or by staff authorised by the headteacher following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including electronic devices, will be managed in line with the DFE '[Searching, screening and confiscation at school](#)' guidance.
  - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the

- pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
- Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

### 3.2 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
  - listen carefully to the concern and be non-judgmental.
  - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern in line with school record keeping requirements – using My Concern, providing as much factual detail as possible.
  - inform the DSL (or deputy), as soon as practically possible.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- St Stephen's Junior School will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
  - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)
  - Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Integrated Children's Services (ICS) in Kent can be found here: [www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services](http://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services)
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a 'request for support' will be made immediately to Integrated Children's Services (via the 'Front Door') and/or the police, in line with KSCMP procedures.
  - St Stephen's Junior School recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
    - If they believe a child may be in need of support but are unclear whether a Request for Support should be submitted, the DSL may seek [advice or guidance](#) from a social worker via the Front Door Service before deciding next steps.
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of [Integrated Children's Services](#) (ICS) and are accessed via the 'Front Door Service'/[Kent Children's Services Portal](#).
- 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
  - If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
  - Where Intensive Support Early Help (provided by ICS, outlined in the [KSCMP support levels guidance](#)) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the [Kent Children's Services Portal](#).
  - Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.
  - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.
  - The DSL, or a deputy DSL in the absence of the DSL will have the overall responsibility for making referrals. However, all staff are made aware of the local process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- In the event of a request for support to the Front Door Service being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will always be informed in the case of a request for support being submitted by the school, unless there is a valid reason not to do so, for example, if informing them may put a child at risk of harm or could undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following [KSCMP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.
- St Stephen's Junior School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.
- DSLs and staff will be mindful of the need for the school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.

### **3.3 Child protection records**

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding concern system – MyConcern, which is accessed by all DSL's.
- If a written record is completed, due to MyConcern not being accessible, then it will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed within MyConcern if injuries have been observed.
- Concerns will be recorded as soon as possible.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, or do not have a MyConcern login, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Any child protection records, made prior to MyConcern, or from other schools will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

### **3.4 Transferring Child Protection Files**

- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained. If the subsequent school uses the My Concern system then files will be transferred electronically within it.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files, the DSL will ensure key staff such as the special educational needs co-ordinators (SENCOs) will be made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

### **3.4 Multi-Agency Working**

- St Stephen's Junior School recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong

and co-operative local relationships with professionals in other agencies in line with statutory guidance.

- The St Stephens Junior School leadership team, trustees and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- St Stephen's Junior School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
  - St Stephen's Junior School will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
  - The headteacher/principal and DSL are aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school 'Searching, Screening and Confiscation' policy and/or behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance. **Headteachers and DSLs should access the DfE 'Searching, screening and confiscation at school' guidance**

### 3.5 Confidentiality and Information Sharing

- St Stephen's Junior School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2025.
- St Stephen's Junior School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is complaint with all matters relating to confidentiality and information sharing requirements. Our DPO can be contacted at:

**Invicta Law Ltd**

**DPO contact telephone number: 01622 392051**

**DPO contact email address: [dpo@invicta.law](mailto:dpo@invicta.law)**

- The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2025). DfE "Information sharing advice for safeguarding practitioners" provides further detail.
- The headteacher and DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.

- All staff will be provided with training and information to ensure they have due regard to the relevant data protection principles, which allow them to share and/or withhold personal information.
- KCSIE, the [Information Commissioner's Office \(ICO\)](#), DfE [Data Protection in schools guidance](#) and DfE [Information sharing advice for safeguarding practitioners](#) guidance provides further details regarding information sharing principles and expectations
- All staff are made aware of the need to protect the privacy of the children in their care, as well the legal requirements that exist to ensure that information relating to the child is handled in a way that ensures both confidentiality and safeguarding.
  - St Stephen's Junior School will ensure staff are aware of our confidentiality policy and will ensure there is an area where staff may talk to parents and/or carers confidentially.
  - All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.
  - Staff are made aware of their professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information.
  - The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on schools and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
  - All staff will be provided with training and information to ensure they understand the relevant data protection principles which allow them to share and/or withhold personal information.
  - KCSIE, the [Information Commissioner's Office \(ICO\)](#), DfE [Data Protection in schools guidance](#) and DfE [Information sharing advice for safeguarding practitioners](#) guidance provides further details regarding information sharing principles and expectations. [This](#) information is available on Office 365.
- The headteacher and DSL will disclose relevant safeguarding information about a student with staff on a 'need to know' basis.

### 3.6 Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found in the office.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
  - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- The leadership team at St Stephen's Junior School will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

#### 4. Specific Safeguarding Issues

- St Stephen's Junior School is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read annex B of KCSIE 2025 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

##### 4.1 Child on Child Abuse

- All members of staff at St Stephen's Junior School recognise that children can abuse other children, and that it can happen both inside and outside of school and online.
- St Stephen's Junior School recognises that child on child abuse can take many forms, including but not limited to:
  - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - abuse in intimate personal relationships between peers
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence and sexual harassment
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE (in particular, part two and five).
- St Stephen's Junior School believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- St Stephen's Junior School recognises that even if there are no reported cases of child on child abuse, such abuse is still likely to be taking place.

- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that some child on child abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- In order to minimise the risk of child-on-child abuse, St Stephens Junior School will:
  - Implement, monitor and evaluate the behaviour policy at all times, ensuring consistent implementation.
  - Pro-actively teach pupils about anti-bullying, inclusivity, tolerance and acceptance along with the school value of Belonging.
  - Regularly reviewing behaviour logs and incidents and responding to patterns of behaviour.
  - Supporting both the perpetrator and victim with pastoral intervention and support.
  - Ensuring pupils have key members of staff to support them feeling safe.
- St Stephens Junior school want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying, and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about learner's behaviour, including child on child abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
- In order to minimise the risk of child-on-child abuse, St Stephen's Junior School will make anti-bullying procedures a key focus of both the behavior policy and the PSHE curriculum. All children will be made aware of who to report any concerns to and all staff will be vigilant with reporting any concerns.
- St Stephen's Junior School want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child on child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by child on child abuse will be supported by a comprehensive approach, led by a DSL, which will include taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies e.g. the school/college anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children

#### **4.2 Child on Child Sexual Violence or Harassment**

- When responding to concerns relating to child on child sexual violence or harassment, St Stephen's Junior School will follow the guidance outlined in Part Five of KCSIE 2025.

#### **Child-on-Child Abuse**

The school recognises that children can abuse other children, and that such abuse can occur **inside and outside of school, and online**.

Child-on-child abuse is a **safeguarding issue** and will never be dismissed as banter, horseplay, or part of growing up.

Child-on-child abuse may include:

- Bullying (including cyberbullying and prejudice-based bullying)
- Physical abuse
- Sexual violence and sexual harassment
- Sharing of nude or semi-nude images
- Abuse in intimate personal relationships between peers
- Initiation or hazing-type behaviours

All staff are expected to:

- Report concerns immediately to the DSL
- Record concerns factually and promptly
- Reassure victims that they are being taken seriously

- The school will follow KCSIE 2025 guidance and local procedures when responding to child-on-child abuse, including appropriate referrals to external agencies where required.
- St Stephen's Junior School recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children's Services and/or the Police.
  - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a

crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or school staff, and, any other related issues or wider context.

- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.
  - St Stephens Junior School recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- St Stephens Junior School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
  - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support, for example [KSCMP](#) procedures.
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
  - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) via the Children's Portal and/or the police. Important considerations which may influence this decision include:
  - the wishes of the victim in terms of how they want to proceed.
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
  - the ages of the children involved.
  - the developmental stages of the children involved.
  - any power imbalance between the children.
  - if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
  - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
  - understanding intra familial harms and any necessary support for siblings following incidents.
  - whether there are any ongoing risks to the victim, other children, adult students, or school staff.
  - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
- If at any stage the DSL is unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

#### **4.3 Nude and/or Semi-Nude Image Sharing by Children**

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it should be read and understood by all DSLs working with all age groups

- St Stephen's Junior School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
  - Report any concerns to the DSL immediately.
  - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
  - Not delete the imagery or ask the child to delete it.
  - Not say or do anything to blame or shame any children involved.
  - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
  - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
  - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
  - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
  - All decisions and action taken will be recorded in line with our child protection procedures.
  - a referral will be made to ICS via the children's portal and/or the police immediately if:
    - the incident involves an adult (over 18).

- there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
- the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Front Door Service

#### **4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- St Stephen's Junior School recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- St Stephen's Junior School recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- St Stephens Junior School recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.5 Serious Violence**

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.

- St Stephens Junior school recognises that the likelihood of involvement in serious violence may be increased by factors such as being male, having been frequently absent or permanently excluded, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Additionally, violence can peak in the hours just before or just after school when students are travelling to and from school and these may be particularly risky times for children involved in serious violence.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.
  - The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

#### 4.6 Modern Slavery and the National Referral Mechanism (NRM)

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will and responded to in line with this policy.

#### 4.7 So-called honour based abuse

- So-called 'honour' - based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage (it is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used) and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL or a deputy).
- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.
  - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl.
  - It will be rare for teachers to see visual evidence, and they should not be examining pupils, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#).
  - Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Children's Services should be informed as appropriate.
- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)

#### 4.8 Preventing radicalisation

- St Stephen's Junior School is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from becoming involved with or supporting terrorism, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- St Stephen's Junior School recognises that children are susceptible to radicalisation into terrorism and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.
- All staff have received appropriate training to enable them to be alert to changes in children's behaviour which could [indicate that they may need help or protection from radicalisation](#).
- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the [local procedures](#) in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.
- Staff regularly update their Prevent training in school, regular training and safeguarding updates also regularly refer to all staffs Prevent duty which are within the school timetable.
- Where a child is receiving support regarding concerns relating to preventing radicalisation, for example, through the 'Channel' programme, the DSL will consider if it would be appropriate to share any information if/when a child leaves to attend any new schools/colleges, so support can be put in place in place for when the child arrives. **Statutory guidance on Channel is available at: [Channel guidance and Channel training from the Home Office](#).**

#### 4.9 Cybercrime

- St Stephen's Junior School recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.
- DSL's will also seek advice from the police or Front Door Service if needed

#### 4.10 Domestic abuse

- St Stephens Junior School recognises that:
  - domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.

- domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
- children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship 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.
- domestic abuse can take place within different types of relationships, including ex-partners and family members.
- there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
- domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
- domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
- it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.

- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.
- St Stephens Junior School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
  - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.
  - Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service will be made if there are any concerns about a child's welfare.
  - Where the school is unsure of how to respond to a notification, advice may be sought from the Front Door Service, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

#### 4.11 Mental health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.12 Bruising in non-mobile children** (remove if not applicable to school/college type)

- Bruising in babies, infants or children with complex needs that are not mobile (meaning a child who is unable to move independently through rolling, crawling, cruising, or bottom shuffling) is unusual and should always be explored.
- If St Stephens Junior school is concerned about actual or suspected bruising on a non-mobile child, we will respond in line with the '[Kent and Medway Protocol for the Management of Actual or Suspected Bruising in Infants and Children who are not Independently Mobile](#)' procedures (2.2.8 of the KSCMP procedures). In summary, these procedures state:
  - If a child appears seriously ill or injured, emergency treatment should be sought through an emergency department (ED) and the Kent ICS should be notified of the concern and the child's location.
  - In all other cases:
    - Staff must inform the DSL immediately and describe and document accurately on a body map, the size, shape, colour, and position of the mark/s on the head and/or body.
    - Any explanation of the history of the injury or comments by the parents/carers will be documented accurately (verbatim) in the child's record, along with the body map.
    - If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to Kent ICS, who have responsibility for arranging further multi-agency assessments.
    - If there are concerns regarding the immediate safety of the child or staff, the police will be called.
    - If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from the Front Door Service.

### **5. Supporting Children Potentially at Greater Risk of Harm**

- Whilst all children should be protected, some groups of children are potentially at greater risk of harm. Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it.

#### **5.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)**

- St Stephen's Junior School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect or exploitation

- St Stephen's Junior School recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse neglect and exploitation such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND.
  - Our school has robust intimate/personal care policies which ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems. Further information can be found in our policies:

## 5.2 Children Requiring Mental Health Support

- St Stephen's Junior School has an important role to play in supporting the mental health and wellbeing of our pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Staff report all mental health concerns via My Concern.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

Our approaches to mental health:

- Age/ability appropriate education will be provided to our students to help promote positive health, wellbeing, and resilience.
- St Stephens Junior School have a Nurture accreditation to ensure that all pupils have a sense of safety within the school environment.
- PHSE and RSE are regularly taught with a focus on promoting wellbeing and positive mental health. Children are taught strategies to support their mental health
- Our senior mental health lead is Karyn Taylor.

### **5.3 Children missing or absent from education**

#### **Children Missing or Absent from Education**

All staff should be aware that children who are missing education, or who experience persistent or unexplained absence, may be at increased risk of abuse, neglect, exploitation, or radicalisation.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Children's Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Where possible, the school will hold more than one emergency contact number for each pupil so we have additional options to contact a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm.

Where the school have concerns that a child has unexplainable and/or persistent absences from education and/or is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [Kent PRU and Attendance Service \(KPAS\)](#). Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#). Please see part two of KCSIE links to other relevant guidance.

### **5.4 Children attending alternative provision**

- Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil. This includes the school.
  - having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
  - regularly reviewing (at least half termly) the alternative provision placements made to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.
- Where safeguarding concerns arise, placements will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

### **5.5 Elective Home Education (EHE)**

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#).
- We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

## 5.6 Children who may benefit from Early Help

- Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - is frequently missing/goes missing from education, home or care,
  - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
  - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - is at risk of being radicalised or exploited
  - has a parent or carer in custody, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing alcohol and other drugs themselves
  - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
  - is a privately fostered child.
- Where it is identified a child may need early help, staff and DSLs will respond in line with section 3 of this policy.  
Early help is a **safeguarding response**, aimed at preventing issues from escalating.  
Staff should discuss concerns with the DSL, who will determine appropriate next steps in line with Kent Support Levels Guidance and local procedures.

## 5.7 Children who need a Social Worker (Child in need and Child Protection plans)

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

## 5.8 Looked after children, previously looked after children and care leavers

- St Stephen's Junior School recognises the common reason for children becoming looked after is as a result of abuse and/or neglect/ exploitation and a previously looked after child also potentially remains vulnerable.
- The school has appointed a 'designated teacher' (Jo Sazant - SENCO) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSLs to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

### **5.9 Children who are privately fostered**

- Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.
- Where private fostering arrangements come to the attention of the school, for example, through the normal course of their interaction and promotion of learning activities with children, we must notify Kent Integrated Children's Services in line with the local KSCMP arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child.

### **5.10 Children who are Lesbian, Gay, Bisexual, or Gender Questioning/Trans (LGBT)**

**Please note: the DfE expects to publish the revised guidance on gender questioning children this summer. The policy may need to be reviewed when this document is made available.**

**Additional support for education settings regarding equality, diversity and inclusion is available via the Education People EDIT team**

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, St Stephen's Junior School recognises that children who are LGBT or are perceived by other

children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.

- When supporting a trans or gender questioning child, the school/colleges will consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. **Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed**
- St Stephen's Junior School recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT education is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space that facilitates a culture where children can speak out or share any concerns.

## 6. Online Safety

### Online Safety

Online safety is an **integral part of safeguarding** and is treated with the same importance as offline safety.

The school recognises that children may be exposed to harmful content or interactions online, including:

- Sexual exploitation
- Radicalisation
- Cyberbullying
- Harmful challenges
- Grooming

The school will:

- Ensure appropriate filtering and monitoring systems are in place
- Provide staff with regular online safety training
- Educate pupils about online risks as part of a whole-school safeguarding approach
- Work in partnership with parents and carers

Online safety concerns must be reported to the DSL in the same way as any other safeguarding concern.

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. St Stephen's Junior School will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- St Stephen's Junior School will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- St Stephen's Junior School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- St Stephen's Junior School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.
- The headteacher will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.
- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Anti-bullying policy, Social Media policy and behaviour policies.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- St Stephens Junior School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems
- All school owned devices and systems will be used in accordance with relevant policies, including but not limited to acceptable use policies, code of conduct

## 6.1 Generative Artificial Intelligence (AI)

**Generative artificial intelligence (AI) presents exciting opportunities; if used safely and effectively, AI can support children to achieve at school/college and develop the knowledge and skills they need for life. Additionally, AI has the power to transform education by helping teachers and staff focus on teaching, for example, by reducing workload. However, the use of AI also poses several safeguarding risks to children and staff, as well as risks to the safety and integrity of systems.**

**Leaders may need/wish to write a standalone policy for use of AI and/or refer to use of AI in relevant curriculum-based policies. This should address use of AI tools whilst in school/college, and also any use off site to ensure compliance with both the schools/college policies and national legislation, for example data protection requirements etc.**

**The following links provide further information and policy templates for leaders to consider:**

- [Generative artificial intelligence \(AI\) in education - GOV.UK](#)
- [Using AI in education settings: support materials - GOV.UK](#)
- [Generative AI: product safety expectations - GOV.UK](#)
- [Generative AI in education: user research and technical report - GOV.UK](#)

- [\*\*Generative AI in education: educator and expert views - GOV.UK\*\*](#)
- [\*\*Data protection in schools - Artificial intelligence \(AI\) and data protection in schools - Guidance - GOV.UK \(www.gov.uk\)\*\*](#)
- [\*\*Artificial Intelligence and Online Safety | SWGfL\*\*](#)
- [\*\*Using artificial intelligence \(AI\) safely | Internet Matters\*\*](#)
- [\*\*Integrating AI in Schools: New Policy Template Available | SWGfL\*\*](#)
- [\*\*Ofsted's approach to artificial intelligence \(AI\) - GOV.UK\*\*](#)
- [\*\*National AI Strategy - GOV.UK\*\*](#)

- St Stephens junior school recognises that when used safely, effectively and with the right infrastructure in place, generative artificial intelligence (AI) tools have many uses which could benefit our entire school community. However, these tools are not being used within the classroom environment by pupils.
- Pupils are taught about AI within the school computing curriculum.
- However, it is important to recognise that AI tools can also pose safeguarding risks to our community as well as moral, ethical and legal concerns. This includes, but is not limited to:
  - exposure to inappropriate or harmful content, including bullying, harassment, abuse and exploitation
  - privacy and data protection breaches/risks
  - intellectual property infringements
  - academic integrity challenges such as plagiarism and cheating
  - exposure to inaccurate, misleading, or biased content.
- St Stephens Junior School only permits the use of generative AI tools which have been approved and provided by the for work and/or educational purposes, following the senior leadership team undertaking risk assessments and/or data protection impact assessments prior to use. These are only used by staff.
- St Stephens Junior School will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour, data protection, complaints and child protection.
- Where the School believe that AI tools may have facilitated the creation of child sexual abuse material, the school/college will respond in line with existing local safeguarding procedures and national guidance from the IWF and NCA-CEOP.
- Where the School are responding to concerns regarding digitally manipulated and AI-generated nudes and semi-nudes, the school will respond in line with section 4.3 of this policy and the local KSCMP safeguarding procedures and UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance.
- Where the School believe that AI tools may have facilitated deep fake abuse of adults, advice and support will be provided to individuals affected, such as via Unions, Professionals Online Safety Helpline or Report Harmful Content and/or if a crime has been committed, via the police. Action will be taken in line with relevant School/College policies, including but not limited to, anti-bullying, behaviour and complaints.

## 6.1 Policies and Procedures

- The DSLs have overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.
- The DSLs will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, social media and behaviour policies.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- St Stephen's Junior School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet and email systems.
  - All St Stephen's Junior School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- St Stephens Junior School recognises that generative artificial intelligence (AI) tools may have many uses which could benefit our school community. However, it is important to recognise that AI tools can also pose risks; this is including, but not limited to, bullying and harassment, abuse and exploitation (including child sexual abuse), privacy and data protection risks, plagiarism and cheating, and inaccurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.
  - Staff will be made aware of the benefits and risks of using AI tools through staff training etc.
  - Staff are required to carry out a risk assessment and seek written approval from the senior leadership team prior to any use of AI in school.
  - St Stephens Junior School will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour and child protection. Where the School believe that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, the school will respond in line with the UKCIS guidance '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance.
- St Stephens Junior School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities. In accordance with KCSIE
  - St Stephens Junior School has appropriate acceptable use, code of conduct and image use policies in place, which are shared and understood by all members of the community. These policies can be found on Office 365.

### 6.3 Appropriate Filtering and Monitoring

- St Stephen's Junior School will do all we reasonably can to limit children's exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place. Details of our filtering systems in place can be found in our Online Safety Policy.
- When implementing appropriate filtering and monitoring, St Stephens Junior School will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
  - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
  - It is the responsibilities of the headteacher to make sure that online safety training is included in staff safeguarding and child protection training.

- If learners or staff discover unsuitable sites or material, they are required to report the concern immediately to the DSLs and ICT technicians.
- Staff working with pupils are expected to be vigilant and actively monitor pupils, reporting any concerns on My Concern and to the ICT technician.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded on My Concern and reported to the DSL who will respond as appropriate.
- Filtering and monitoring concerns are also logged by the ICT technician who reviews effectiveness of filtering and any further actions needed.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police.
- When implementing appropriate filtering and monitoring, St Stephen's Junior School will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- If staff consider that pupils learning is being impacted by over blocking this should be reported to Senior leadership and IT technician.
- 
- St Stephen's Junior School acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety.
  - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
  - Learners internet use will be supervised by staff according to their age and ability.
  - Learners will be directed to use age appropriate online resources and tools by staff.

### 6.3.1 Responsibilities

- Our trustee board has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- The Headteachers and N. Anderton and A. Porter, are responsible for ensuring that our school/college has met the DfE Filtering and monitoring standards for schools and colleges.
  - Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness
  - Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
  - Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
  - Make sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
  - Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

Senior Leaders are responsible for:

- procuring filtering and monitoring systems.
- documenting decisions on what is blocked or allowed and why.
- reviewing the effectiveness of our provision.
- overseeing reports.

- ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
- ensuring the DSL and IT service providers/staff have sufficient time and support to manage their filtering and monitoring responsibilities.

The DSL takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher and governing board to review this policy annually and ensure the procedures and implementation are updated and reviewed regularly
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- Working with the ICT manager to make sure the appropriate systems and processes are in place
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school's child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or governing board
- Undertaking annual risk assessments that consider and reflect the risks children face
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively

This list is not intended to be exhaustive.

- The IT service providers/staff have technical responsibility for:
  - maintaining filtering and monitoring systems.
  - providing filtering and monitoring reports.
  - completing technical actions identified following any concerns or checks to systems.
  - working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.

- All staff, pupils and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

### 6.3. 2 Decision making and reviewing our filtering and monitoring provision

- When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the IT service providers/staff. Decisions have been recorded and informed by an approach which ensures our systems meet our school specific needs and circumstances, including but not limited to our pupil risk profile and specific technology use.
- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- Our school undertakes an at least annual review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.
- In addition, our school undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the school that we are meeting our safeguarding obligations.
  - These checks are achieved by use of test filtering weekly. Weekly ICT report from J.Ball, Daily report from Netsweeper on search parameters.

#### 6.2.3 Appropriate filtering

Settings should list specific details of how their appropriate filtering is established and achieved in their setting; for example, which filtering systems/approaches are in place and why these decisions have been made. Leaders and DSLs should access the [UK Safer Internet Centre guidance](#) and the [DfE filtering and monitoring standards](#) for further information about appropriate monitoring approaches and what they entail

*No filtering system can be 100% effective; schools and colleges need to understand the coverage of their filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet their statutory requirements as identified in KCSIE and the Prevent duty*

- St Stephens Junior school education broadband connectivity is provided through and uses filtering system SNS UK / Netsweeper
  - Netsweeper is a member of [Internet Watch Foundation](#) (IWF). Netsweeper has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
  - Netsweeper is blocking access to illegal content including child sexual abuse material (CSAM).
  - Netsweeper blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- We filter internet use on all school owned, or provided, internet enabled devices and networks. All devices which access the wifi (staff mobiles, guest wifi) are also filtered and monitored as part of this system. These systems ensure that IP addresses, individual users and devices can be identified.
- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school owned devices and networks, and all devices using the school broadband connection.

- We work with Netsweeper and our IT service providers/staff to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
- If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies.
- Parents/carers will be informed of filtering breaches involving their child.
- Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the [Internet Watch Foundation](#) (where there are concerns about child sexual abuse material), [Kent Police](#), [NCA-CEOP](#) or [Kent Integrated Children's Services via the Kent Integrated Children's Services Portal](#).
- If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team.

#### **6.3.4 Appropriate monitoring**

Settings should list specific details of how their appropriate monitoring approaches are established and achieved in their setting; for example, the monitoring systems/approaches in place and leaders should be able to explain why these decisions have been made. Leaders and DSLs should access the [UK Safer Internet Centre guidance](#) and the [DfE filtering and monitoring standards](#) for further information about appropriate monitoring approaches and what they entail

No monitoring system can be 100% effective; schools and colleges need to understand the coverage of their monitoring approaches system, any limitations, and mitigate accordingly to minimise harm and meet their statutory requirements as identified in KCSIE and the Prevent duty

- We will appropriately monitor internet use on all school provided devices and networks. This is achieved by:
  - Physical monitoring and supervision in class
  - Monitoring internet and web access
  - Notification of searches which are flagged on the filtering and monitoring system
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- This is detailed in our acceptable use policy, behavior policy and privacy notices.
- If a concern is identified via our monitoring approaches:
  - Where the concern relates to pupils it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - Where the concern relates to staff, it will be reported to the headteacher (or chair of trustees if the concern relates to the headteacher), in line with our staff conduct/ allegations policy.

- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, [Kent Police via 101](#), [NCA-CEOP](#), LADO or [Kent Integrated Children's Services via the Kent Integrated Children's Services Portal](#).

#### **6.4 Information security and access management**

- St Stephens Junior School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in our, acceptable use policies and/or online safety policy.
- St Stephens Junior school will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.
- The Headteachers and N.Anderton/ A. Porter , are responsible for ensuring that our school has met the DfE [cyber security standards](#) for schools and colleges.

#### **6.5 Remote/Online learning**

**Specific guidance for DSLs and SLT regarding remote learning is available at**

- DfE: Safeguarding and remote education during coronavirus (COVID-19)**
- NSPCC: Undertaking remote teaching safely**
- Kent County Council: Remote Learning Guidance for SLT**
- St Stephen's Junior school will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and agreed systems.
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school/college behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).

#### **6.6 Online Safety Training for Staff**

- St Stephens Junior School will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.

- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

## 6.7 Educating pupils

- St Stephens Junior School will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

**DSLs and leaders may find it helpful to access UK Council for Internet Safety (UKCIS) 'Education for a Connected World Framework' and DfE 'Teaching online safety in school' guidance. A variety of online safety templates and guidance from the Education Safeguarding Service can be accessed [here](#)**

**Specific guidance for DSLs and SLT regarding remote learning is available at**

- DfE: Safeguarding and remote education during coronavirus (COVID-19)
- NSPCC: Undertaking remote teaching safely
- Kent County Council: Remote Learning Guidance for SLT

- St Stephens Junior School will ensure any remote sharing of information, communication and use of
- manage online risks effectively as part of providing a broad and balanced curriculum.

## 6.8 Working with parents/carers

- St Stephen's Junior School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:
  - Educating pupils around online safety.
  - Regularly sharing information around online safety with parents and carers in a variety of formats.
- St Stephens Junior School will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:
  - Providing information on our website around online content and guidance.
  - Behaviour policy
  - Parent agreement
  - Acceptable use

Where the school is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response. **Additional local advice is available for DSLs and SLT via the Education Safeguarding Service blog post: 'Think before you scare'**

## 7. Staff Engagement and Expectations

### 7.1 Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of the current version of 'Keeping Children Safe in Education' which covers safeguarding information for staff.
  - School leaders, including the DSL and trustees will read KCSIE in its entirety.
  - School leaders and all members of staff who work directly with children will read annex B of KCSIE.
- All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is kept on the single central record.
- It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the school internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners and explores the Kent processes to follow. This is done through regular termly training and Yearly INSET training.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. This is done through regular termly training and Yearly INSET training.
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. Safeguarding platforms are reviewed and training is based on our demographics along with the latest information received from DSL courses/ Newsletters.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This is done through regular termly training and Yearly INSET training.
- St Stephen's Junior School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies. This is through regular sharing of information and policies. All DSL's have an open door policy.
- All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to be assured that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated. This is through, annual updates, or refresher training every two years.
- The DSLs and Safeguarding Co-ordinator will provide an annual report to the trustee detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

## **7.2 Safer Working Practice**

- Our school takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.
- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school code of conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff behaviour policy, Acceptable Use Policies, and Social Media.

## **7.3. Supervision and Support**

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **8. Safer Recruitment and Allegations**

### **8.1 Safer Recruitment and Safeguarding Checks**

- St Stephen's Junior School is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
  - St Stephen's Junior School will follow relevant guidance in Keeping Children Safe in Education 2025 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
  - Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process.

- The governing body/ and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
  - The governing body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- St Stephen's Junior School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
- Where the school/college places a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will need to satisfy ourselves that the provider can meet the needs of the pupil.
  - St Stephen's Junior will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school/college would otherwise perform in respect of our own staff.

Where the school organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE

## **8.2 Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors**

### **Low-Level Concerns**

The school promotes a culture in which staff feel confident to share concerns about adults working in or on behalf of the school.

A low-level concern is any concern that does not meet the harm threshold but may indicate behaviour that is inconsistent with the staff code of conduct.

All low-level concerns will:

- Be reported to the Headteacher
- Be recorded in writing
- Be reviewed to identify patterns or emerging risks

Sharing low-level concerns helps to create a safe culture and protects both children and staff.

- The School will respond to allegations in line with the local Kent allegations arrangements. In depth information can be found within our 'Managing Allegations against Staff' and staff behaviour policy/code of conduct policy. This can be found in the staff room and in the office. etc. This applies to any individual or organisation that is using the school premises if an allegation is made, the LADO will be informed and local arrangements will be followed.
- **All allegations about staff members, whether low level concerns or allegations should be to the Headteacher.**
- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance.

Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

- Where headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.
  - In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteacher (and if they have been involved, the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.
  - In the situation that the school receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the LADO.

### **8.2.1 Concerns that meet the 'harm threshold'**

- St Stephen's Junior School recognises that it is possible for any member of staff, including volunteers, trustees, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone 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 he or she 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.
- Allegations against staff which meet this threshold will be referred immediately to the headteacher who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.
- In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.
- If staff are concerned that appropriate safeguarding action is not being taken following an allegation against a colleague, they are advised to follow our whistleblowing process and/or to contact the LADO directly themselves.

### **8.2.2 Concerns that do not meet the 'harm threshold'**

- St Stephen's Junior School may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
  - St Stephens Junior School has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

- A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff behaviour policy/code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to [the LADO](#).
  - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
  - Where low-level concerns are reported to the school, the headteacher will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
  - The headteacher will share concerns and liaise with [the LADO](#) enquiries officer.
  - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
  - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with [the LADO](#).
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
  - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
  - Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO](#) and following our disciplinary/HR procedures.

**All allegations about staff should be made to the Headteacher.**

### **8.2.3 Safe Culture**

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff behaviour policy/code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at St Stephen's Junior School will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

- St Stephen's Junior School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
  - If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#).

## 9. Opportunities to teach safeguarding

- St Stephen's Junior School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships Education
- We recognise that school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- St Stephen's Junior School recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.
- St Stephens Junior School recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.
- St Stephens Junior school has a clear set of values and standards, upheld, and demonstrated throughout all aspects of school/life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- St Stephens Junior School recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse, neglect or exploitation, and children with SEND.

## 10 Physical Safety

### 10.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our behaviour policy alongside the government document “Use of Reasonable force in schools” The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. Further information regarding our approach and expectations can be found in our behaviour policy and in line with the DfE [‘Use of reasonable force in schools’](#) guidance

## 10.2 The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

## 10.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor’s badge whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

## Local Support

- All members of staff in St Stephen’s Junior School are made aware of local support available.
  - **Kent Integrated Children’s Services/ Children’s Social Work Services**
    - [Kent Integrated Children’s Services Portal](#) – select ‘urgent’ if there is an immediate risk/concern
    - Front Door Service: 03000 411111
    - Out of Hours Number: 03000 419191

- **Kent Police**
  - 101 or 999 if there is an immediate risk of harm
- PC 14605 Simon Proctor. Beat Officer | Community Safety Unit | Canterbury| East. ( Mobile 07773937244. : e- mail [simon.proctor1@kent.police.uk](mailto:simon.proctor1@kent.police.uk)
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - [www.kscmp.org.uk](http://www.kscmp.org.uk)
  - 03000 421126 or [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)
- **Kent LADO Education Safeguarding Advisory Service (LESAS) – Support for Kent Children’s Workforce**
  - [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#)
    - To speak to the LADO regarding an allegation against a member of staff, complete a referral on the [Kent Integrated Children’s Services Portal](#).
    - To raise a LADO, strategic education safeguarding or online safety enquiry, commission a review or enquiry about bespoke training or other safeguarding products, please use the [LESAS enquiry form](#).

Data protection officer – advice about data protection, safeguarding and GDPR:

Invicta Law Ltd

DPO contact telephone number:

01622 392051 DPO contact email address: [dpo@invicta.law](mailto:dpo@invicta.law)

## Appendix 1: Categories of Abuse

**All staff should be aware that abuse, neglect, and exploitation safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.**

**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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance

- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

**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.

#### **Signs that MAY INDICATE physical abuse**

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

**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 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.

#### **Signs that MAY INDICATE emotional abuse**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression

- Compulsive stealing
- Drug, alcohol, solvent abuse
- Witnessing domestic abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

**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 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.

**Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2: Support Organisations

### KSCMP

- Factsheets: [www.kscmp.org.uk/training/factsheets](http://www.kscmp.org.uk/training/factsheets)
- Supporting resources: [www.kscmp.org.uk/training/training-resources](http://www.kscmp.org.uk/training/training-resources)
- Video explainers: [www.kscmp.org.uk/training/video-explainers](http://www.kscmp.org.uk/training/video-explainers)
- Missing children: [www.kscmp.org.uk/guidance/missing-children](http://www.kscmp.org.uk/guidance/missing-children)

### NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](http://0800 136 663) or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### National Organisations

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- Barnardo's: [www.barnardos.org.uk](http://www.barnardos.org.uk)
- Action for Children: [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk)
- Children's Society: [www.childrenssociety.org.uk](http://www.childrenssociety.org.uk)
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### Support for Staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- NSPCC Whistleblowing helpline: [www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/](http://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/)

### Support for Learners

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Lucy Faithfull Foundation 'Shore Space': <https://shorespace.org.uk/>

### Support for Adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Advice now: [www.advicenow.org.uk](http://www.advicenow.org.uk)

### Support for special educational needs

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>
- Kent Autistic Trust: [www.kentautistictrust.org/](http://www.kentautistictrust.org/)
- AFASIC: [www.afasic.org.uk/](http://www.afasic.org.uk/)
- National Autistic Society: [www.autism.org.uk/](http://www.autism.org.uk/)
- Kent County Council: [www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children](http://www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children)
- Portage: [www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-children-under-5/portage-supporting-pre-school-children-with-send](http://www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-children-under-5/portage-supporting-pre-school-children-with-send)
- Information Advice and Support Kent (IASK): [www.iask.org.uk/](http://www.iask.org.uk/)

## Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

## Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

## Substance Misuse

- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)

## Domestic Abuse

- KSCMP: [www.kscmp.org.uk/guidance/domestic-abuse](http://www.kscmp.org.uk/guidance/domestic-abuse)
- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvicepline.org.uk](http://www.mensadvicepline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phoneline: <https://respectphoneline.org.uk>

## Criminal and Sexual Exploitation

- KSCMP: [www.kscmp.org.uk/guidance/exploitation](http://www.kscmp.org.uk/guidance/exploitation)
- Kent & Medway Violence Reduction Unit: <https://kentandmedwayvru.co.uk/>
- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- The Children's Society: [www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation](http://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation)

## Honour Based Abuse

- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- FGM Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

- Mandatory reporting of female genital mutilation: procedural information: [www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

### **Radicalisation and hate**

- Kent Prevent Education Officers: [www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education](http://www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education)
- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

### **Child on Child abuse, including bullying, sexual violence and harassment**

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Diana Award: [www.antibullyingpro.com/](http://www.antibullyingpro.com/)
- Bullying UK: [www.bullying.co.uk](http://www.bullying.co.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- Lucy Faithfull Foundation 'Shore Space': <https://shorespace.org.uk/>

### **Online Safety**

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)
- KSCMP: [www.kscmp.org.uk/guidance/online-safety](http://www.kscmp.org.uk/guidance/online-safety)

### **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Anna Freud: [www.annafreud.org/schools-and-colleges/](http://www.annafreud.org/schools-and-colleges/)

- KSCMP: [www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health](http://www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health)
- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): [www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/](http://www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/)

### **Children with Family Members in Prison**

- National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>