Child Protection Policy and Procedures

September 2026

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Key Contacts in School

	Name	Jubilee Primary School contact information
Designated Safeguarding Lead (DSL)	Marilyn Nadesan (Headteacher)	headeacher@jubileeprimaryschool.org.uk 01622 808873
Deputy Designated Safeguarding Leads	Becky Biddlecombe (Assistant Headteacher) Kirsty Coleman (Assistant Headteacher) Eloisa Langston ((Assistant Headteacher) Mark Biddlecombe	Becky.Biddlecombe@jubileeprimaryschool.org.uk Kirsty.Coleman@jubileeprimaryschool.org.uk Eloisa.Langston@jubileeprimaryschool.org.uk Mark.biddlecombe@jubileeprimaryschool.org.uk
Safeguarding Trustee	Smita Chengappa	Smita.chengappa@jubileeprimaryschool.org.uk 01622 808873

This is a core policy that forms part of the induction for all staff and is based on DfE 'Keeping Children Safe in Education' 2026 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. They should also read and understand at least part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE), in full and review this guidance at least annually

Date written: September 2026

Date agreed and ratified by Board of Trustees : September ?

Date of next review: September 2027

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

What to do if you have a welfare concern in Jubilee Primary School

1. Why are you concerned?

For example:

- Disclosure, behaviour, witnessed concerning behaviour
- Child's appearance which may include unexplained marks as well as dress

2. Immediately record your concerns:
Follow the school's procedure by updating My Concern:

- Reassure the child
- Clarify concerns if necessary (TED: Tell, Explain, Describe)
- Use the child's own words
- Use correct terminology when writing your account
- Seek support from the DSL

3. Inform the Designated Safeguarding Lead:

Designated Safeguarding Leads:
Marilyn Nadesan (Headteacher)
Deputy Designated Safeguarding Leads

- Consider whether the child is at immediate risk of harm, e.g. unsafe to go home
- Access the Kent Safeguarding Children Multi-agency Partnership (KSCMP) https://www.kscmp.org.uk/
- Refer to other agencies as appropriate: KSCMP includes Local authority (LA); Clinical commissioning group within the LA; Chief office of police within the LA. You may refer to LADO, Police, Early Help and Notification, or Inter Agency Referral Form. The school distinguishes between "universal services and community-based early help" and the "targeted early help level of Family Help." When making referrals or discussing support, staff will be clear about which level of support is being considered.
- Education Safeguarding Service: Maidstone 03301651200, or Area Education Officer: Nicholas Abrahams 03000 410058

4. If you are unhappy with the response:

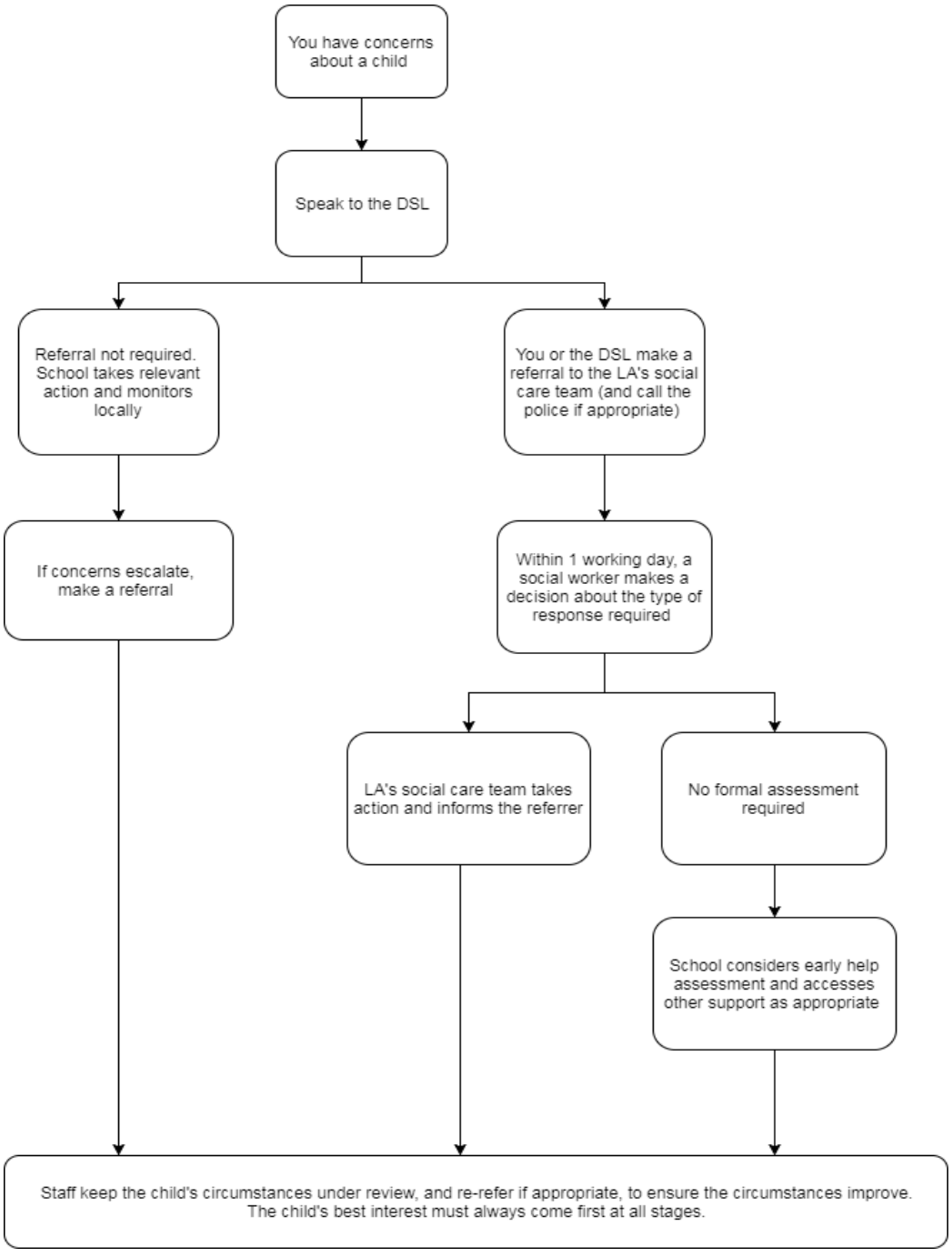
Staff: Seek advice from the Education Safeguarding Team Adviser: Claire Ray 03301651200
Follow Whistleblowing Procedures:
https://www.jubileeprimaryschool.org.uk/school-policies/

Record: Record decision-making and action taken in the child's child protection/safeguarding file on My Concern.

5. **Monitor:** Be clear about what you are monitoring - behaviour and appearance. State how long you will monitor - where, how and to whom you will feedback and how you will record.

6. **Review** and re-refer if necessary. At all stages, the child's circumstances will be kept under review. The DSL/ Staff will re-refer if required to ensure the child's safety is paramount.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note – if the DSL is unavailable, this should not delay action.)



7.

Introduction

Jubilee Primary School (referred to in this document as 'the school') recognise 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 the school community safe and secure.

All adults working with and supporting children must ensure that they are aware of child protection procedures and report all concerns in line with the school's code of practice. By working in close partnership with educational welfare officers, social services, parents and carers we seek to ensure that the risk of abuse, neglect and exploitation is kept to a minimum and the safety and welfare of the children is promoted at all times.

The School believes that the best interests of children always come first. All children 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 the 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.

The 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.

The principles underpinning this policy are:

- The welfare of the child is paramount at all times.
- All children, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse, neglect or exploitation.
- Whilst it is not the School's responsibility to determine whether abuse, neglect or exploitation has taken place (this is taken in liaison with external child protection professionals), it is the responsibility of all staff working at the school to report any concerns to the Designated Safeguarding Lead (DSL).
- All incidents of suspected poor practice and any allegations made will be taken seriously and responded to swiftly and appropriately.
- Confidentiality will be upheld in line with the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025 (collectively referred to as 'data protection laws'), The Human Rights Act 2000 and the Freedom of Information Act 2000. However, the safety of the child is the primary consideration and overrides all other considerations. No promises of confidentiality are made, as confidentiality will be governed by the need to protect the child. Confidentiality will not be maintained if the withholding of information will prejudice the welfare of the child. The identity of the person subject to the referral will

normally remain confidential but may have to be revealed for the purposes of subsequent legal action.

There are four main elements to our safeguarding policy:

- Prevention (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
- Protection (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
- Support (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- Working with parents and other agencies (to ensure appropriate communications and actions are undertaken).

The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and are consistent with those of Kent Safeguarding Children Multi-agency Partnership (KSCMP). The Trust Board have regard to the KCSIE 2026 guidance and will ensure our policies, procedures and training are effective and comply with the law at all times.

1. Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance and the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023) and the Academy Trust Governance Guide.

This includes:

- Keeping Children Safe in Education 2026 (KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- Framework for the Assessment of Children in Need and their Families 2000
- Kent and Medway Safeguarding Children Procedures
- Statutory Framework for the Early Years Foundation Stage 2021 (EYFS)
- The Education Act 2002
- Education and Inspections Act 2006
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Any other member of staff should inform the DSL if they discover that FGM appears to have been carried out.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Trustees and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- The statutory framework for the Early Years Foundation Stage [requirements relating to safeguarding and welfare]
- The Crime and Policing Act 2026, which removed the supervision exemption for volunteers in regulated activity 260909 Child Protection and Safeguarding.

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.

Definition of Safeguarding

In line with KCSIE 2026, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Making or sharing of nudes or semi-nudes is where children make or share nude or semi-nude images, videos or live streams. This includes images that are digitally altered or wholly generated by artificial intelligence (e.g., deepfakes). All such incidents mandate a safeguarding response.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Children with family members in prison
- Children Missing Education (CME)
- 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
- Parental Conflict (as defined by the government as 'conflict that is frequent, intense, poorly resolved or damaging')
- 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
- Child-on-child abuse
- 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
- Upskirting

(See also Part One and Annex B within 'Keeping Children Safe in Education' 2026)

All safeguarding policies will be reviewed on an annual (minimum) basis by the Board of Trustees, which has responsibility for oversight of school safeguarding and child protection systems. The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems in school to the Board of Trustees. The Board of Trustees will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

Every member of staff at Jubilee Primary School recognises that children experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

Related Safeguarding Policies

We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies/procedures listed below:

- Code of conduct/Behaviour policy
- Online Safety and Social Media
- ICT Acceptable Use Policy
- Anti-Bullying
- Data Protection and Information Sharing
- Relationships and Health Education
- Health and Safety
- Attendance (Children absent from education)
- Risk Assessments (e.g. school trips, use of technology)
- First Aid and Accidents
- Managing Allegations Against Staff
- Code of Conduct for Staff (including Acceptable Use of Technology/AUP)
- Safer Recruitment
- Whistle-Blowing

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

- Teachers Standards 2012
- "Safeguarding Disabled Children – Practice Guidance" - DOH, 2009
- "Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - Safer Recruitment Consortium, October 2015
- "What to do if you are worried a child is being abused" – DfE, March 2015
- KCSMP document: "Safe Practice with Technology – Guidance for Adults who Work with Children and Young People"
- KCC Safeguarding Children and Child Protection – "Induction Leaflet Guidelines for School Staff"
- KCC Guidelines for "Safeguarding Record Keeping in Schools"
- KCC Advice notes - "Dealing with Disclosures in School"
- Early Years Foundation Stage 2017 Welfare Requirements

Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education, particularly on repeat occasions and/or for prolonged periods
- Whose parent/carer has expressed an intention to remove them from school to be home educated

2. Key Responsibilities

- Everyone who comes into contact with children and their families has a role to play in safeguarding children. Schools and colleges form part of the wider safeguarding system for children.
- The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our PSHCEE curriculum.

Trustees

- The Board of Trustees has read and follows KCSIE 2026.
- Facilitate a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- The school has a nominated Trustee for safeguarding named on the front of this document. The nominated Trustee will take the lead role in ensuring that the school has an effective policy that interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policy and structures supporting safeguarding children are reviewed at least annually.
- Ensure 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. Ensure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of their safeguarding training.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This review must be conducted at least once every academic year by the Senior Leadership Team (SLT) member responsible for filtering and monitoring, supported by the Designated Safeguarding Lead (DSL) and IT support. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

    - Reviewing the DfE's "Filtering and monitoring standards", and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

- The Board of Trustees, Headteacher and Leadership Team will ensure that the DSL is properly supported in this role at a time and resource level.
- Ensure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role.
- Trustees receive training to ensure that they have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge and can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.
- As the Chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.
- Be aware that misandry, alongside misogyny, must be addressed within the school's child protection policy as factors requiring attention.

Designated Safeguarding Lead (DSL)

- The school has appointed a member of the leadership team Marilyn Nadesan (Headteacher) as the Designated Safeguarding Lead (DSL).
- The school has appointed the following staff as Deputy Designated Safeguarding Leads (DDSLs), who have all attended appropriate DSL training, which enables them to fulfil this role:
    - Mark Biddlecombe
    - Kirsty Coleman
    - Becky Biddlecombe
    - Eloisa Langston

  Whilst the activities of the Designated Safeguarding Lead may be delegated to the DDSLs, the ultimate lead responsibility for safeguarding and child protection remains with the Designated Safeguarding Lead and this responsibility will not be delegated.
- The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems, including online safety in school, and understanding filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- The DSL will undergo appropriate and specific training every 2 years to provide them with the knowledge and skills required to carry out their role. This training will be approved by and meet the standards as required by the Kent Safeguarding Children Board. The DSL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods at regular intervals, at least annually, to keep up with any developments relevant to their role.

It is the role of the DSL to:

- act as the central contact point for all staff to discuss any safeguarding concerns
- maintain a confidential recording system for safeguarding and child protection concerns
- coordinate safeguarding action for individual children
- in the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- liaise with other agencies and professionals in line with Working Together to Safeguard children
- ensure that locally established procedures are followed and making referrals to other agencies, including Early Help and Specialist Children's Services (SCS) as necessary
- represent, or ensure the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences)
- manage and monitor the school's part in Early Help / Child in Need / Child Protection plans
- be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns
- ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE 2026, including online safety
- Oversee the safe use of technology, mobile phones and cameras in the setting
- The full responsibilities of the DSL and deputy are set out in their job description and further details about the role of the DSL can be found in KCSIE 2026.

Members of Staff

All members of staff have a responsibility to:

- Read and understand Part One in its entirety and Annex B of KCSIE 2026. Note: Annex A (the condensed summary) has been removed, and all staff members (including those not working directly with children) must now read Part One in full and sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Be aware of the school's systems which support safeguarding and the policies and procedures surrounding them. This includes online safety and expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Be aware of what to look for to identify children who need help or protection as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- provide a safe environment in which children can learn
- ensure all children are able to develop appropriate strategies to recognise and respond to risk and build resilience
- identify and recognise children who may be in need of early help, who are suffering, or are likely to suffer significant harm
- provide help for children, where appropriate and reasonable
- take appropriate action to prevent safeguarding concerns escalating and work with other services as needed
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the school safeguarding regime (this may include accessing the school whistleblowing policy)
- maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the child
- respond to and refer any concerns about children or other members of the community in accordance with this policy
- be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

All members of staff in Jubilee Primary School know what to do if a child tells them he/she is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation, as this may ultimately not be in the best interests of the child.

The welfare and safety of children are the responsibility of all staff in school and ANY concern for a pupil's welfare MUST always be reported to the Designated Safeguarding Lead/s.

Children and Young People

Children and young people (pupils) have a responsibility to:

- contribute to the development of school safeguarding policies
- seek help from a trusted adult if things go wrong, and support others that may be experiencing safeguarding concerns
- develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online

- confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Parents and Carers

Parents/carers have a responsibility to:

- read the relevant school/policies and procures, encouraging their children to adhere to them, and adhering to them themselves where appropriate
- discuss safeguarding issues with their children, support the school in their safeguarding approaches, and reinforce appropriate safe behaviours at home
- identify changes in behaviour which could indicate that their child is at risk of harm online
- seek help and support from the school, or other appropriate agencies, if they or their child encounters any safeguarding concern.

A statement in the school prospectus will inform parents and carers about our school's duties and responsibilities under child protection and safeguarding procedures. Details are also available on the school website.

Parents can obtain a copy of the school Child Protection Policy and other related policies on request and can view them via the school website (http://www.jubileeprimaryschool.org.uk/policies-3/).

Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

3. Safeguarding and Child Protection Procedures

3.1 Recognition and Types of Abuse and Neglect

All staff in school should be aware of the definitions, signs, and symptoms of abuse. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

The most up to date definitions and possible indicators and signs of abuse are found in Keeping Children Safe in Education 2026 and 'What to do if you are worried a child is being abused' 2015.

3.2 Categories of Abuse

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. All members of staff should read and understand part one of Keeping Children Safe in Education 2026 and staff who have direct contact with pupils should also read Annex A.

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.

Physical abuse: a form of abuse that 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.

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.

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

All staff should be aware that abuse, neglect and 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. See Appendix 1 for signs that may indicate the various types of abuse listed below.

- All members of staff recognise abuse, neglect, 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.
- Members of staff are aware that child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. For example, children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger.
- 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. In the case of honour-based abuse, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child may often experience more than one type of abuse, as well as other difficulties in their lives.
- Abuse and neglect can happen over a period of time, but can also be a one off event. This can have major long-term impacts on all aspects of a child's health, development and wellbeing.
- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also 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.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.
- 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.
- Bear in mind that some children may not feel ready, or know how to tell someone that they are being abused, exploited or neglected. They may not recognise their experience as harmful or they may feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and

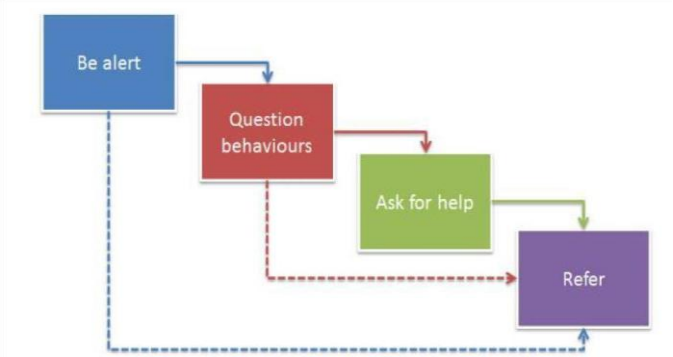
in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

Additional guidance for staff includes:

- 'What to do if you are Worried About a Child Being Abused' (DfE, 2015)
- Information Sharing Advice for Safeguarding Practitioners (2015)
- Kent and Medway Inter-Agency Threshold Criteria for Children in Need
- The Assessment Framework for Children in Need and their Families (2000)

These documents can be found in the staff shared area.
'What to do if you are worried about a child being abused' (DfE, 2015) p.12 identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



3.3 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 on 'My Concern' in line with school record keeping requirements.
  - inform the DSL (or deputy), as soon as practically possible.
- The 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
  - 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

- 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.
  - The school recognises 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.
  - The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
  - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).
- 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.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Where it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door. We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.
- 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.
- The school is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.
- It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and/or the police.
- The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

- It is the responsibility of the DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services.
- To help with this decision it may be appropriate to consult with the Area Education Safeguarding Adviser from the Education Safeguarding Team and/or the Education Safeguarding Adviser (Online Protection) for online safety concerns.
- On occasion, staff may pass information about a child to the DSL, but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned that appropriate action is not being taken, it is the responsibility of that staff member to seek further direct consultation from either a member of the Education Safeguarding Team or Specialist Children's Services who may be able to discuss the concern and provide advice on appropriate action to be taken.
- If after a referral a child's situation does not appear to be improving, then the DSL (or the person that made the referral) will request reconsideration to ensure that the setting's concerns have been addressed and, most importantly, that the child's situation improves. Professional disagreements (escalation) will be responded to in line with the KCSMP procedures and DSLs may request support via the Education Safeguarding Team.

3.3 Record Keeping

- We will hold all records in line with our records retention schedule.
- In accordance with the school's 'Safeguarding Record Keeping Procedures, 2018,' staff will record any welfare concern that they have about a child using *'My Concern'* online system of recording, (with a body map if injuries have been observed). If concerns are urgent the DSL should be informed without delay. Records will be completed as soon as possible after the incident/event, using the child's words (only facts – not opinions), recorded with the staff member's name.
- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded on 'My Concern'. If members of staff are in any doubt about recording requirements, they should discuss their concerns with DSL.
- All staff have their own log-on for 'My Concern', and have received appropriate training.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school.
- Safeguarding records are kept in accordance with GDPR regulations and any paper records are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- Detailed guidance on record keeping is found in the school 'Safeguarding Record Keeping Procedures, 2018'.

- 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.
- Child protection records 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 school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with GDPR legislation to the child's subsequent school/setting, under confidential and separate cover as soon as possible. These will be transferred securely to the new DSL and confirmation of receipt will be obtained.
- 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 in advance of a child leaving, for example, information that would allow the new school 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)/ named person with oversight for SEN, will be made aware of relevant information as required.

3.4 Multi-agency Working

- Jubilee Primary 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.
- Schools are not the investigating agency when there are child protection concerns and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required, and recognise that a crucial part of this may be in supporting the child while these take place.
- Jubilee Primary 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.

3.5 Confidentiality and Information Sharing

- Jubilee Primary 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 2026.
- The 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. Siobhan Bray is the school's DPL.

- All members of staff must be aware that whilst they have duties to keep any information about children, families and colleagues which have access to as a result of their role confidential, they also have a 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. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.
- If the school is made aware of any safeguarding concerns which they feel need to be shared with the wider community (including other local schools) then advice will be sought from the Education Safeguarding team to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.
- The Data Protection Act 2018 and 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 2024). DfE 'Information sharing advice for safeguarding practitioners' (2018) provides further detail, located in the school office.
- The DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.
- If a victim asks the school not to tell anyone about sexual violence or sexual harassment, there is no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- Regarding anonymity, all staff will be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system. They will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved. They will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

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's 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 staff shared area and on the website.
- The leadership team at Jubilee Primary 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.

Staff are also directed to the Whistle Blowing policy which is a separate document covering concerns regarding the way the school safeguards pupils, including poor or unsafe practice, or potential failures.

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
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.

Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with '*Statement of Procedures for dealing with Allegations against Staff Policy'.*

4. Specific Safeguarding Issues

- Jubilee Primary 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 2026 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 Section 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-child Abuse

- All members of staff at Jubilee Primary School recognise that children are capable of abusing their peers, and that it can happen both inside and outside of school/college and online.
- The 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

- up skirting (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

- The 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.
- The 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 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.
- 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. Section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable. Note: legislation is for schools only and is not applicable to independent schools.
- In order to minimise the risk of child-on-child abuse, the school will implement a robust anti-bullying policy, providing an age/ability appropriate PSHE and RHE curriculum, always taking into account the concerns of children.
- The school wants 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 the appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies e.g. the school anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

4.2 Child on Child Sexual Violence or Harassment

When responding to concerns relating to child-on-child sexual violence or harassment, Jubilee Primary School will follow the guidance outlined in Part Five of KCSIE 2026.

Harmful Sexual Behaviour (HSB)

The school recognises that harmful sexual behaviour exists on a continuum and is now addressed as a distinct section within KCSIE 2026. HSB includes behaviour that:

- Is developmentally inappropriate
- May be harmful to the child displaying it or to others
- May indicate the child displaying it has been harmed themselves

When responding to concerns about HSB, staff will:

- Consider the child's age and stage of sexual development using NSPCC resources on typical stages of sexual development
- Assess whether the behaviour is age-appropriate or concerning
- Report all concerns to the DSL immediately

Sexual Violence and Sexual Harassment

The 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.

Updated Legal Definitions:

- The legal definitions are set out in the Sexual Offences Act 2003.
  - Assault by penetration: A person (A) commits this offence if they intentionally penetrate another person's (B's) vagina or anus with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents. Whether A's belief is reasonable is determined by considering all the circumstances, including any steps taken to establish consent. This offence is defined under Section 2 of the Sexual Offences Act 2003.
  - Sexual assault: A person (A) commits this offence if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Whether A's belief is reasonable is determined by considering all the circumstances, including any steps taken to establish consent. This offence is defined under Section 3 of the Sexual Offences Act 2003.

Consent: The school recognises that consent is a critical concept. KCSIE 2026 provides expanded definitions of consent which staff must understand. Consent is:

- About having the freedom and capacity to choose
- Can be withdrawn at any time
- Cannot be given if a child is under the influence of alcohol or drugs
- Cannot be given if violence, threats or coercion are used

- 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.
- The school understands that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation. The school will do all it can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- 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.

4.3 Making or Sharing of Nudes or Semi-Nudes by Children"

The term 'making or sharing of nudes or semi-nudes' is used to mean the making, sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. This explicitly includes images that are digitally altered or wholly generated by artificial intelligence (e.g., deepfakes). All such incidents mandate a safeguarding response. 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 "Making or 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, and should be read and understood by DSLs working will all age groups, not just older learners.

- Jubilee Primary School recognises that consensual and non-consensual making or 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 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 Education Safeguarding Service.

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

- Jubilee Primary 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.
- 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, increased absence from school, 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.

- 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 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 the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. It is illegal to cause a child under the age of 18 to marry, even if violence, threats, or coercion, are not used.
- 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 a DDSL) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
- If a member of staff discovers that a pupil has been subjected to FGM, this member of staff must report this to the police immediately. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

4.7 Preventing radicalisation

Jubilee Primary 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 being drawn into 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.

- The school recognises that learners are susceptible to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour that could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (DDSLs), who is aware of the local procedures to follow.

4.8 Cybercrime

- Jubilee Primary 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.

4.9 Modern Slavery and Financial Exploitation
The school recognises that modern slavery and financial exploitation are core exploitation risks that staff must be able to recognise. Modern slavery encompasses human trafficking, forced labour, and domestic servitude. Financial exploitation involves the illegal or unauthorised use of a person's money, property, or resources.
Staff should be alert to signs including:
- Unexplained wealth or possessions
- Signs of physical abuse or malnourishment
- Appearing to be under the control of others
- Restricted freedom of movement
- Fear or anxiety when discussing their situation

Any concerns regarding modern slavery or financial exploitation will be reported to the DSL immediately and responded to in line with this policy.

4.10 Child to Parent Abuse
The school recognises that child-to-parent or caregiver abuse is a safeguarding concern that requires appropriate response. This form of abuse involves children using harmful behaviour towards their parents or caregivers, which may include physical violence, emotional abuse, financial abuse, or coercive control.
Staff should be aware that:
- This type of abuse can affect families across all demographics
- Parents may feel ashamed or reluctant to seek help
- The child may also be experiencing harm or trauma that contributes to their behaviour

Any concerns regarding child-to-parent abuse will be reported to the DSL who will assess the situation and determine appropriate support for both the child and family.

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.

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

- Jubilee Primary School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group.
- The 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 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 disproportionally 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 disproportionally impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school/college will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCo to plan support as required.

5.2 Children Requiring Mental Health Support

- 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.
- 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.
- There are plans to train two members of staff to become Mental Health First Aiders.

Young Carers

The school recognises that young carers may face additional safeguarding vulnerabilities due to their caring responsibilities. Young carers are children who provide care for a family member who has a physical or mental illness, disability, or substance misuse problem.

The school will:

- Identify young carers through sensitive enquiry and observation
- Ensure young carers receive appropriate support to balance their caring responsibilities with their education
- Work with families and external agencies to ensure the child's welfare is safeguarded
- Be alert to signs that caring responsibilities may be impacting the child's wellbeing, attendance, or attainment

Staff should report any concerns about young carers to the DSL.

Children with Medical Conditions

The school recognises that children with specific medical conditions may face distinct safeguarding requirements and additional vulnerabilities. These children may be at increased risk of:

- Abuse or neglect related to their medical care
- Bullying or discrimination
- Missing education due to medical appointments or illness

- Social isolation

The school will:

- Maintain up-to-date medical care plans for children with medical conditions
- Ensure staff are trained to recognise signs of medical neglect
- Work closely with healthcare professionals and families
- Monitor attendance and wellbeing of children with medical conditions
- Provide appropriate support to enable full participation in school life

Any concerns about children with medical conditions will be reported to the DSL.

5.3 Children who are absent from Education

Children absent from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including (but not limited to) neglect, sexual abuse, and child sexual and criminal exploitation.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, the school will follow local child protection procedures, including with respect to making reasonable enquiries. The school will make an immediate referral to the local

authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

5.4 Elective Home Education

- 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 and will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

5.5 Children who need a Social Worker

- 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.

5.6 Looked after children, previously looked after children and care leavers

- Jubilee Primary School recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- The school has appointed a 'designated teacher' (Becky Biddlecombe) 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 DSL 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/college 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.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Jubilee Primary School has adopted 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.

- Jubilee Primary School will ensure online safety is reflected as required in all relevant policies. Online safety, including filtering and monitoring systems, 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.
- Jubilee Primary 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 misinformation, disinformation (including fake news) and conspiracy theories.
    - **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.
- Jubilee Primary 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 (DSL) will be informed of online safety concerns as appropriate. The named Trustees for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

Mobile Phone Policy

Jubilee Primary School recognises the default standard that all schools should be "mobile phone-free environments." The school restricts pupil access to mobile phones during lessons, breaktimes, and lunchtimes to:

- Minimise disruption to learning
- Reduce opportunities for cyberbullying
- Protect children from inappropriate content
- Support children's wellbeing and social interaction

Children who walk to school and back home independently, are allowed to bring a mobile phone to school. This is signed into the office by the child on arrival and collected at the end of the day, when the child is leaving for home.

Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Jubilee Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Jubilee Primary School will treat any use of AI to access harmful content or bully pupils in line with this policy and our [anti-bullying/behaviour/artificial intelligence] policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education. Add any additional procedures you may have in place for dealing with safeguarding concerns related to AI – for example where indecent images have been shared that are AI-generated. We recognise that the field of AI is continuously developing and any additional safeguarding procedures will be added as needed

6.1 Policies and Procedures

- The DSL has 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 details are outlined in our Acceptable Use Policy
- The DSL 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.
- Jubilee Primary School uses a wide range of technology. This includes computers, laptops, learnpads, iPads and other digital devices, the internet, our learning platform and email systems.
    - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Jubilee Primary School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2026 and EYFS Framework 2023, Jubilee Primary School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found on the staff shared area.

6.2 This review must be conducted at least once every academic year by the Senior Leadership Team (SLT)

and Monitoring

- Jubilee Primary 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. We have Sophos Anti-virus endpoint protection provided and monitored by BC Tech
- If learners or staff discover unsuitable sites or material, they are required to: turn off monitor/screen and report the concern immediately to a member of staff.
- 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.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
- 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, Jubilee Primary 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.
- Jubilee Primary 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.

The school will conduct a strict review of filtering and monitoring systems at least once every academic year. This review will be conducted by the Senior Leadership Team (SLT) member responsible for filtering and monitoring (Marilyn Nadesan, Headteacher), supported by the Designated Safeguarding Lead and IT support (BC Tech).

The review will include:

- Assessment of the effectiveness of current filtering and monitoring systems
- Identification of any breaches or concerns
- Consideration of emerging risks and technologies
- Updates to systems and procedures as required
- Documentation of the review process and outcomes

The DSL has lead responsibility for understanding the filtering and monitoring systems in place as part of their role.

6.3 Information Security and Access Management

- Jubilee Primary 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 learners. Further information can be found in the

Acceptable Use policies. The school will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.4 Staff Training

- The school will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. This includes understanding the expectations, roles and responsibilities in relation to filtering and monitoring.

6.5 Educating Learners

- The school will ensure a comprehensive whole school curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

6.6 Working with Parents/Carers

- Jubilee Primary School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by providing information on our school website and through existing communication channels (such as official social media, newsletters etc.), offering specific online safety events for parents/carers or highlighting online safety at existing events.

6.7 Remote Learning

- Jubilee Primary 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.
- All communication with learners and parents/carers will take place using school provided or approved communication channels with agreed systems. These have so far been Zoom and Google Classroom.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our school Behaviour Policy and Acceptable Use Policies.
- Staff and learners 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), which is available on the staff shared drive.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Jubilee Primary School will continue to be clear whom from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

7. Staff Engagement and Expectations

7.1 Awareness, Induction and Training

- All members of staff have been provided with a copy of Part One of 'Keeping Children Safe in Education' 2026, which they must read in its entirety.
  School leaders, including the DSL will read KCSIE in its entirety.
  - School leaders and all members of staff who work directly with children will read Annex B.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. The information will be stored on the single central record.
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction. This will take place through specific training by the DSL.
- All staff members (including agency and third-party staff) will receive appropriate safeguarding and child protection training (including online safety) at least annually to ensure they are aware of a range of safeguarding issues. This includes an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- 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. These updates will be communicated through further training and staff updates during staff meetings.
- Training will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training and curriculum planning. It will be in line with advice from the three safeguarding partners and have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils.
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Volunteers will receive appropriate training, if applicable to the role.
- Staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies. E.g. input from knowledgeable and experienced staff and inviting input at staff meetings.
- The DSL and Headteacher will provide an annual report to the Board of Trustees detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.
- Although the school has a nominated lead for the Board of Trustees (Smita Chengappa), all members of the Board will access appropriate safeguarding training, which covers their specific strategic responsibilities on a regular basis.

7.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school.
- 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 Behaviour Policy/Code of Conduct and Acceptable Use Policy (AUP) and Artificial Intelligence Policy.
- Staff will be made aware of the school Behaviour Management and Physical Intervention policies. Staff will manage behaviour effectively to ensure a 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 ensure that members of staff who are working within the Foundation Stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.
- 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.

7.4 Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

8. Safer Recruitment and Allegations

8.1 Safer Recruitment and Safeguarding Checks

- Jubilee Primary School is committed to 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.
- Jubilee Primary School will follow relevant guidance in Keeping Children Safe in Education 2026 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS).
- The Board of Trustees and the leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
- The Board of Trustees 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.
- Jubilee Primary 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.
- The school advises all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- The school will also consider carrying out an online search on shortlisted candidates. Shortlisted candidates will be informed that the school may carry out these checks as part of its due diligence process.
- Where the school places learners with an alternative provision provider, the school/college will continue to be responsible for the safeguarding of that child. The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Volunteers and Regulated Activity

The Crime and Policing Act 2026 removed the supervision exemption for volunteers. Any volunteer who frequently teaches, trains, instructs, or supervises children is legally in regulated activity, requiring an enhanced DBS check with children's barred list information. There are no exceptions to this requirement.
The school will:

- Ensure all volunteers who meet the criteria for regulated activity undergo enhanced DBS checks with barred list information
- Not rely on supervision as a means of exempting volunteers from DBS checks
- Maintain accurate records of all volunteers and their DBS check status on the Single Central Record

Previous guidance in Annex E of KCSIE 2025 regarding the supervision exemption has been completely removed and is no longer applicable.

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

- The school will respond to allegations in line with the local Kent allegations arrangements and Part Four of KCSIE 2026. In depth information can be found within our 'Managing Allegations against Staff' and Staff Behaviour Policy/Code of Conduct. This can be found on the staff shared area.
- 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 the Headteacher is unsure how to respond, or if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

8.2.1 Concerns that meet the 'harm threshold'

- Jubilee Primary 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 Trustees who will contact the LADO. In the event of concerns/allegations about the Headteacher, this should be reported directly to the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- Jubilee Primary 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.
- Where low-level concerns are reported to the school, the Headteacher will need to share or liaise with the LADO enquiries officer via the LADO Enquiry Line.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our staff behaviour policy/code of conduct – this includes what a low-level concern is and the importance of sharing them.

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 Jubilee Primary School will takes all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedures (to be rewritten). 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.
- Jubilee Primary 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.

Shared Safeguarding Duties with Third-Party Providers

Jubilee Primary School recognises that we share active safeguarding duties regarding supply teachers, trainee teachers, and contracted staff. The school will:

- Ensure all supply teachers, trainee teachers, and contracted staff receive appropriate safeguarding induction
- Confirm that supply agencies have conducted appropriate safeguarding checks

- Maintain oversight of safeguarding practices of all adults working with children
- Report any concerns about supply teachers, trainee teachers, or contracted staff in line with our allegations procedures
- Ensure supply teachers, trainee teachers, and contracted staff understand our safeguarding policies and procedures

The school retains responsibility for the safeguarding of all children, regardless of whether staff are directly employed or provided through third parties.

9. **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 and/or the Headteacher.

10. Opportunities to teach safeguarding

- Jubilee Primary 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 and Health Education.
- We recognise that the schools 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.
- The school recognises 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.

11. Physical Safety

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. Teachers have undertaken training so that we can support children if these circumstances arise.

12. 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 Board of Trustees 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.
- If the school receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, the school will follow its safeguarding policies and procedures, informing the LADO, as with any safeguarding allegation.

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. All visitors, staff and wear lanyards based on their roles and DBS checks.
- 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.

13. Local Support

All members of staff at Jubilee Primary School are made aware of local support available.

- **Education Safeguarding Service**
  Area Safeguarding Advisor
  - Maidstone 03301651440
  - Area Education Officer: Nicholas Abrahams 03000 410058

- **Online Safety in the Education Safeguarding Service**
  - 03301651500
  - esafetyofficer@theeducationpeople.org (non-urgent issues only)

- **LADO Service**
  - Telephone: 03000 410888
  - Email: kentchildrenslado@kent.gov.uk

- **Integrated Children's Services**
  - Front door: 03000 411111
  - Out of Hours Number: 03000 419191

- **Kent Police**
  - 101 or 999 if there is an immediate risk of harm
  - PC Jodie Hobbs (Schools coordinator) 01622 652727
  - Jaz Pay (Local PCSO) 07976766097

- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - kscmp@kent.gov.uk
  - 03000 421126

- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email

14. Temporary Accommodation Notification Duty

The school is aware of the Temporary Accommodation Notification Duty placed on local housing authorities when relocating children. This duty requires housing authorities to notify the relevant local authority and, where applicable, schools when families with children are placed in temporary accommodation.

The school will:

- Work cooperatively with local housing authorities when notified of children placed in temporary accommodation
- Recognise that children in temporary accommodation may face additional safeguarding vulnerabilities
- Ensure appropriate support is provided to children and families in temporary accommodation
- Monitor the welfare and attendance of children in temporary accommodation
- Report any safeguarding concerns in line with this policy

Staff should be aware that children in temporary accommodation may experience:

- Disruption to education and social networks
- Increased stress and anxiety
- Potential safeguarding risks associated with temporary accommodation settings

Any concerns about children in temporary accommodation should be reported to the DSL.

16. Supporting Pupils Questioning Their Gender

16.1 General Principles

Jubilee Primary School is aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers, or their broader social environment.

The school will take a strong, proactive stance on all forms of bullying, including bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while we will appropriately sanction any cases of bullying or harassment, we must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, the school will take a careful approach. The DSL will lead in these cases.

16.2 Involving Parents/Carers

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority. Parents' views will carry great weight and be properly considered in any decision-making. However, in exceptionally rare circumstances where involving parents/carers would pose a greater risk to the child than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.
Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Social Transition

The school will not initiate any action regarding social transition. The school will only respond if a child or their parent specifically requests it.
When a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.
Important: Members of staff will not adopt any changes relating to social transition without a decision involving the parents, except in exceptionally rare cases where doing so would pose a greater risk to the child.
Particular Caution for Primary Schools: As a primary school, Jubilee Primary School will exercise particular caution when considering requests for support with social transition. The guidance states that support for full social transition should be agreed very rarely in primary settings.
In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law. The school will make decisions in line with the following principles:

- **Safeguarding is paramount:** The first step will be to consider what is in the best interests of the child and other children. A decision relating to social transition may not be the same as a child's wishes.
- **Parental involvement is essential:** Parents and carers will be actively involved and their views treated with great importance (except in exceptionally rare circumstances where involving parents or carers would constitute a greater risk to the child).
- **Social transition is an active intervention:** The school will take a very careful approach, recognising that social transition may have significant effects on the child in terms of their psychological functioning and longer-term outcomes.

- **Legal compliance:** The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

The school will ensure that the decision-making process is documented and records are kept. The circumstances or needs of a child may change over time, and the school may need to review its original decision, involving the DSL in doing so.

16.4 Recording Biological Sex

The school is legally required to record a child's biological sex accurately wherever it is recorded. This includes:

- Admission registers
- School management information systems
- Medical records
- Any other official school records

Staff must ensure that biological sex is recorded accurately in all relevant documentation.

16.5 Facilities for Biological Sex

Pupils are not permitted to enter toilets, changing rooms, showers, or boarding/residential accommodation designated for the opposite biological sex. There are no exceptions to this rule, even when supporting a child's social transition.

This mandatory restriction is in place to:

- Protect the privacy and dignity of all pupils
- Ensure the safety and wellbeing of all pupils
- Comply with legal requirements

Where a child has specific needs related to questioning their gender, the school will work with parents/carers to identify appropriate alternative arrangements that safeguard all children.

16.6 Single-Sex Sports and PE

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina, or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety or fairness reasons, there are no exceptions and pupils must not be allowed to participate in sports or PE classes designated for the opposite biological sex.

This approach:

- Ensures fairness in competitive sports
- Protects the safety of all pupils

- Complies with legal requirements under equality legislation
- Does not constitute unlawful discrimination.

All members of staff have been provided

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect and 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.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and school 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 child minder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

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
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

Signs that MAY INDICATE neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at School
- 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

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

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

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.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/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
  - Men's Advice Line: www.mensadviceline.org.uk
  - Mankind: www.mankindcounselling.org.uk
  - National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
  - Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

Honour Based Abuse

- Forced Marriage Unit: 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
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Child-on-child abuse, including bullying, sexual violence and harassment

- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/

- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: 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

Mental Health

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

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

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

Appendix 3: National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Support for Pupils
- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Support for adults
- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Support for Learning Disabilities
- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Domestic Abuse
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- Honour based Violence
- Forced Marriage Unit: https://www.gov.uk/guidance/forced-marriage
- Sexual Abuse and CSE
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Online Safety
- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk

- Get safe Online: www.getsafeonline.org
- Radicalisation and hate
- Educate against Hate: www.educateagainsthate.com
  Counter Terrorism Internet Referral Unit

Trust Board approval and review dates

Changes since last policy version

Date	Amendment
September 2026	Policy has been revised and rewritten in line with latest changes to KCSIE 2026. Update Legislation
	Summary of Changes The main updates required for KCSIE 2026 are: 1. Volunteers in regulated activity - removal of supervision exemption 2. Image sharing terminology - changed to "making or sharing of nudes or semi-nudes" and includes AI-generated images 3. Filtering and monitoring - annual review requirement with specific responsibilities 4. Facilities and sports - mandatory restrictions based on biological sex 5. Social transition - school must not initiate; particular caution for primary schools 6. Data protection - updated to include Data (Use and Access) Act 2025 7. Part Five rewrite - HSB separated from sexual violence with expanded consent definitions 8. Removal of Annex A - all staff must read Part One in full 9. Early Help vs Family Help - distinction clarified 10. Mobile phone policy - default mobile phone-free environment 11. Generative AI - added to online safety considerations 12. Misandry - added alongside misogyny 13. Vulnerable groups - separate sections for young carers and children with medical conditions 14. Modern slavery and financial exploitation - added as core exploitation risks 15. Child to parent abuse - formal recognition added 16. Shared safeguarding duties - strengthened for third-party providers 17. Temporary accommodation duty - new section added

Approval

This policy was reviewed and accepted by the Board at its meeting in Autumn 2026. This policy is due for review in **Autumn 2027**.