Amadeus Primary Academies Trust
Safeguarding and Child Protection Policy

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Status: Statutory	Leadership Lead: S Bridges

Introduction

The responsibility for safeguarding the pupils and staff within all our academies rests ultimately with the Amadeus Primary Academies Trust Board. The Board delegates some oversight of the responsibilities for each academy to its Local Governing Body (LGB).

Each academy must ensure that:

- it implements this safeguarding and child protection policy

- it meets legal requirements

- all required training is up to date as outlined below

- procedures are checked regularly by the LGB

Safeguarding issues are reported to the Audit and Risk Committee of the Trust by the Principal through the academy Risk register which is updated each month or immediately to the relevant member of the Trust Leadership Team if they are significant.

Principals have a meeting at least half termly with the Chief Executive Officer and Chief Finance and Operations Officer (CFOO). This meeting includes a review of safeguarding and standards within the academy. The Trust will implement the same safeguarding system which will be overseen by the Trust Leadership Team.

The Trustee appointed as the Safeguarding lead is Mr P Rhodes (CEO & Accounting Officer) and he underwent training to provide him with the knowledge and skills required to carry out the role.

Hillsgrove Primary School recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is everybody's responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks, and students) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.

We believe 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, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection. Staff working with children at Hillsgrove Primary 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 immediately.

This policy applies where there are any child protection concerns regarding children who attend Hillsgrove Primary School but may also apply to other children connected to the school, for example, siblings.

Hillsgrove Primary School recognises the importance of providing an ethos and environment that will help children to be safe and to feel safe. At 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.

Our core safeguarding principles are:

➔ Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures

➔ Protection: following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns

➔ Support: adopt a child centred approach and provide support for all pupils/students, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.

➔ Collaboration: with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' September 2026.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2026 which requires individual academy, academies and colleges to have an effective child protection policy.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:

- Keeping Children Safe in Education 2026 (KCSIE)
- Working Together to Safeguard Children 2026 (WTSC)
- Ofsted: Education Inspection Framework
- Framework for the Assessment of Children in Need and their Families 2000
- The Education Act 2002
- Education and Inspections Act 2006
- The Human Rights Act 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)

Section 175 of the Education Act 2002 requires 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 an academy. Such arrangements will have to have regard to any guidance issued by the Secretary of State. Hillsgrove Primary School will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

Definition of safeguarding

In line with 'Working Together to Safeguard Children' and KCSIE 2026, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- 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
- promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. Hillsgrove Primary School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

Abuse, neglect and exploitation	Hate
Bullying, including cyberbullying	Homelessness
Child on child abuse	Online safety
Child Sexual Exploitation (CSE)	Child Criminal Exploitation (CCE)
Children with family members in prison	Relationship abuse
Human trafficking and modern slavery	Mental health
Children missing from home or care	Faith abuse
Nude or semi-nude image sharing	Online safety
Contextual safeguarding (risks outside the family home)	Children Missing Education (CME) Unexplainable and/or persistent absences from education
County lines and gangs	Sexual violence and sexual harassment
Serious violence	Drugs and alcohol misuse
Domestic abuse	Sexting
Fabricated or induced illness	So called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
Upskirting	

Supporting guidance to be read and followed alongside this Policy.

- "Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - Safer Recruitment Consortium
- "What to do if you are worried a child is being abused" – DfE, March 2015 see here

Responsibilities

Governance and Leadership

The Trust Board, Trust Leadership Team, LGB and academy Leadership Team have a strategic responsibility for our safeguarding arrangements and will comply with duties under legislation. The Trust Board has regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

All Trustees and Governors will read and work in accordance with the KCSIE 2026 and will attend the regular safeguarding training they are offered which will equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures are effective and support the delivery of a robust whole academy approach to safeguarding.

Hillsgrove Primary School has a nominated governor responsible for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the academy has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required. The academy safeguarding governor will make regular visits to review procedures that are in place and provide reports to the Local Governing Board and Trust Board as appropriate.

The Trust Board, Trust Leadership Team, LGB and academy Leadership Team will ensure that the Designated Safeguarding Lead (DSL) is supported in their role. The Local Governing Body will facilitate a whole academy approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.

The Trust Board and Local Governing Body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. This includes but is not limited to safeguarding all members of the academy community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. For further information about our approaches to equality, diversity, and inclusion, please access our academy policy on our website.

The Trust Board, Trust Leadership Team, LGB and academy Leadership Team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.

The Principal will ensure that our child protection and safeguarding policies and procedures adopted by the Trust Board are understood, and followed by all staff. The Trust Board will ensure an appropriate senior member of staff, from the academy Leadership Team, is appointed to the role of Designated Safeguarding Lead.

Designated Safeguarding Lead (DSL) Responsibilities

- Hillsgrove Primary School has appointed Mrs C Rhodes (Principal), a member of the senior leadership team, as the Designated Safeguarding Lead (DSL)
- Hillsgrove Primary School maintains records of all designated staff for reference and use at Trust level
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in the academy. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated
- Hillsgrove Primary School has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence:
    - Ms Kathryn Laurie
    - Ms Michele Hilton (SENDCO and DSL)
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns
- It is the role of the DSL to carry out their functions as identified in Annex B of KCSIE. This includes but is not limited to:
    - Acting as the central contact point for all staff to discuss any safeguarding concerns
    - Maintaining a confidential recording system for safeguarding and child protection concerns including noting any actions taken, decisions reached and outcomes
    - Coordinating safeguarding action for individual children
    - When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual academy head in the authority that looks after the child, with the DSL liaising closely with the designated teacher
- Liaising with other agencies and professionals in line with KCSIE and WTSC
- Ensuring that locally established procedures as put in place by safeguarding partners procedures, including referrals, are followed, as necessary
- Representing, or ensuring the academy is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
- Managing and monitoring the academy's role in any multi-agency plan for a child
- Being available during term time (during academy hours) for staff in the academy to discuss any safeguarding concerns
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities
- Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and academy leadership staff
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE
- Liaising with the Principal to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019)
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually

Staff Responsibilities

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

- provide a safe environment in which children can learn
- be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection
- know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child
- to be able to identify and act upon indicators that children are, or at risk of developing mental health issues
- be prepared to identify children who may benefit from universal services, community-based Early Help or Family Help
- to understand community-based Early Help and Family Help processes and their role in them
- to understand the academy/ Trust safeguarding policies and systems
- undertake regular and appropriate training which is regularly updated
- be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989
- know how to maintain an appropriate level of confidentiality
- reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe
- act in line with Teachers' Standards 2012 which state that teachers (including Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties

Staff at Hillsgrove Primary School recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

Staff at Hillsgrove Primary School will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our Staff Code of Conduct and pupil behaviour policies.

Children and young people

Children and young people have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- Contribute to the development of Trust / academy Safeguarding policies
- Receive help from a trusted adult
- Learn how to keep themselves safe, including online

Parents and Carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant Hillsgrove Primary School policies and procedures
- Talk to their children about safeguarding issues and support the academy in their safeguarding approaches
- Identify behaviours which could indicate that their child is at risk of harm, including online
- Seek help and support from the academy or other agencies

Child Protection Procedures

Recognising indicators of abuse, neglect and exploitation

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by 'Working Together to Safeguard Children'-2026 and 'Keeping Children Safe in Education-2026'
- Hillsgrove Primary School recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix C):
    - Physical abuse
    - Sexual abuse
    - Emotional abuse
    - Neglect
- By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child:
    - Be alert
    - Question behaviours
    - Ask for help
    - Refer

What to do if you are worried a child is being abused

Hillsgrove Primary School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

Hillsgrove Primary School recognises abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL. Parental behaviours can indicate child abuse, neglect or exploitation, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

Children may report abuse happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy. Safeguarding incidents and/or behaviours can be associated with factors and risks outside the academy. 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.

Hillsgrove Primary School recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.

Hillsgrove Primary School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the Behaviour Policy. The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item. The DSL (or deputy) will then consider the circumstances of the student who has been searched to assess the incident against any potential wider safeguarding concerns. Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

Responding to child protection concerns

If staff are made aware of a child protection concern, they are expected to:

- Listen carefully to the child, reflecting back the concern
- Use the child's language
- Be non-judgmental.
- Avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED)
- Do not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services
- To be clear about boundaries and how the report will be progressed
- Record the concern using the facts as the child presents them, in line with academy record keeping requirements – this will include taking note of any action, decisions reached and outcomes done by the DSL team
- Inform the DSL (or deputy), as soon as practically possible

If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy). The DSL or a deputy should always be available to discuss safeguarding concerns. The academy will maintain a clear, reliable and known arrangement for DSL cover whenever the DSL is unavailable. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, or to a member of the Trust Leadership Team. Advice can be sought in line with local multi-agency safeguarding arrangements. In these circumstances, any action taken will be shared with a DSL as soon as possible. All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other

agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.

Hillsgrove Primary School will respond to safeguarding concerns in line with the Bexley Safeguarding Partnership - SHIELD https://Bexleysafeguardingpartnership.co.uk

Where it is identified that a child may benefit from support before statutory intervention, including universal services, community-based Early Help or the targeted early help level of Family Help, the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door or MASH in line with local arrangements. The DSL will keep these cases under constant review and consideration will be given to escalating concerns to the Front Door or MASH, or seeking advice via the Education Safeguarding Service, if the situation does not appear to be improving or is getting worse.

All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Integrated Children's Services and/or the police in line with Bexley Safeguarding Procedures.

The DSL may seek advice or guidance from an 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 or MASH being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by Bexley. 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. If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the Bexley 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.

DSLs and staff will be mindful of the need for the academy to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the academy where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network. Where the academy is unsure, advice will be sought from the Education Safeguarding Service.

Child Protection Procedures

If staff are made aware of a child protection concern, they are expected to:

- Listen carefully to the concern and be non-judgmental
- Only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED)
- Not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services
- Be clear about boundaries and how the report will be progressed

- Record the concern in line with the academy record keeping requirements
- Inform the DSL (or deputy), immediately in person

If a child is in immediate danger or is at risk of harm, a request for support will be made immediately to Bexley Safeguarding Partnership (SHIELD). All staff are aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments. In most cases, a request for support will be made by the DSL or a deputy. However if the DSL or a deputy is not immediately available to discuss an urgent concern, staff will seek advice from another member of the Senior Leadership Team or from the Education Safeguarding Service or via consultation with a social worker from Bexley. If anyone other than the DSL makes a referral to external services, they will inform the DSL as soon as possible.

In the event of a request for support to Bexley Safeguarding Partnership (SHIELD) being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by Bexley Safeguarding Partnership (SHIELD). Parents/carers will be informed 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.

The DSL will keep all community-based Early Help and Family Help cases under constant review and consideration will be given to a request for support to Bexley 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, the DSL will consider following escalation via Bexley escalation procedures.

Recording Concerns

All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing via the academy/ Trust's safeguarding system, and brought without delay to the attention of the DSL.

- Records will be completed as soon as possible after the incident/event, using the child's words and will be entered as a safeguarding incident on their Chronology. Child protection records will record facts and not personal opinions. A body map will be completed on our electronic system If visible injuries to a child have been observed
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached, and the outcome. Safeguarding records will be clear and factual and will distinguish between observed concerns, professional opinion and historic information.
- Child protection records are kept confidential and stored securely online. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the academy. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by our online system.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent academy, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained. Where a child protection file is transferred, the exporting academy will include a

clear, structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs, clearly distinguishing current concerns from historic information.

- 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 academy in advance of a child leaving, for example, information that would allow the new academy to continue to provide support, particularly where information would support an assessment of risk to others as well as to the individual child. Where there are issues or concerns, it is good practice for the DSLs at both settings to have a direct conversation so that information is actively considered and acted upon
- Where the academy receives child protection files from another setting, safeguarding information will be reviewed promptly by an appropriately trained member of staff so that key risks and needs are clearly understood. The information will be used to support, not disadvantage, the child; where it is unclear or incomplete, clarification will be sought as necessary. The DSL will ensure key staff such as the Special Educational Needs Co-Ordinators (SENCOs) are made aware of relevant information as required.
- Where a student joins the academy and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the student, and if so, if the files have been sent

Multi Agency Working

Hillsgrove Primary School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the Local arrangements as identified within 'Working Together to Safeguard Children'. The Trust Board, Trust Leadership Team, Local Governing Board and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.

Hillsgrove 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 local child protection 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. The academy will allow access for Bexley Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. The Principal and DSL are aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our Trust 'Searching, Screening and Confiscation' Policy and Behaviour Policy, which is informed by the DfE 'Searching, screening and confiscation at academy' guidance.

Confidentiality and information sharing

Hillsgrove 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.

Where reasonably possible, the academy will hold more than one emergency contact number for each pupil/student. There is an expectation that contact information will be held for both parents, unless doing so would put a child at risk of harm.

The Trust has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection

Regulations (UK GDPR) to ensure that our academy is compliant with all matters relating to confidentiality and information sharing requirements. The DPO at the Trust is Sabrina Bridges, Chief Finance and Operations Officer. Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information.

The Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 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 2026, the Information Commissioner's Office (ICO) and the DfE ''Information sharing advice for safeguarding practitioners'' guidance provides further details regarding information sharing principles and expectations.

The Principal and DSL will disclose relevant safeguarding information about a student with staff on a 'need to know' basis. All members of staff must be aware that whilst they have duties to keep information confidential, in line with our data protection policy. Staff 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. In regard to confidentiality and information sharing, staff will only involve those who need to be involved, such as the DSL (or a deputy) and outside agencies such as Police and Children's Social Care. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

Complaints

All members of the Academy/ Trust community should feel able to raise or report any concerns about children's safety or potential failures in the academy's safeguarding regime. The Trust has a complaints procedure available to parents, students and members of staff and visitors who wish to report concerns or complaints. This can be found on the Academy/ Trust website.

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 in education 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.

The leadership team at Hillsgrove Primary School will take all concerns reported to the academy seriously and all complaints will be considered and responded to in line with the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with the relevant section of this policy.

Specific Safeguarding Issues

Hillsgrove Primary School is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, academy leaders and staff who work directly with children will read Annex A of KCSIE which contains important additional information about the following 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 this policy and speak with the DSL or a deputy.

Child-on-child abuse (including harassment and violence)

All members of staff at Hillsgrove Primary School recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of academy and online. Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator; it is preventable, and may involve serious physical harm or threats involving weapons. Early identification and evidence-based support are important.

Hillsgrove Primary 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 children
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, including physical assault or harm (or the threat of harm) with a weapon
- Harmful sexual behaviour (HSB), sexual violence and sexual harassment, which may include misogyny/misandry
- Making or sharing nudes and semi-nudes, consensually or non-consensually, including images generated or altered using artificial intelligence (AI)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE (in particular, part two and five). Hillsgrove Primary School adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it. All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by sex/gender, age, ability and culture of those involved, and may include misogyny or misandry.

Hillsgrove Primary School recognises that even if there are no reported cases of child-on- child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse. In order to minimise the risk of child-on-child abuse, Hillsgrove Primary School implements:

- A robust anti-bullying policy and approach
- An age appropriate PSHE and RSE curriculum that explore healthy relationships and kindness

Hillsgrove Primary 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 academy policies, including child protection, anti-bullying, and behaviour. Students who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Concerns about students' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with students' 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. Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:

- Taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support following the incident
- Working with parents/carers
- Reviewing educational approaches and the curriculum and ensuring it remains responsive where necessary
- Following procedures as identified in other policies including the anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.

Child-on-child harmful sexual behaviour (HSB), sexual harassment and sexual violence

When responding to concerns relating to child-on-child HSB, sexual harassment or sexual violence, Hillsgrove Primary School will follow the guidance outlined in Part five of KCSIE. We recognise that HSB exists on a continuum, from inappropriate or problematic behaviour through to abusive and violent behaviour, and responses will be proportionate to the behaviour, age and developmental stage of the children involved. We recognise that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' We recognise that 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 are never acceptable. All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, 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 ever be made to feel ashamed for making a report.

Abuse that occurs online or outside of the academy will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection and online safety. We recognise that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to students that avoids alarming or distressing them.

Hillsgrove Primary School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation. The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response. The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support.

The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff and any actions that are required to protect them. Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice. Reports will initially be managed internally by the academy and where necessary will be

referred to Bexley (community-based Early Help, Family Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:

- The wishes of the victim in terms of how they want to proceed
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- If the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature
- That sexual violence and sexual harassment can take place within intimate personal relationships between children
- Understanding intra familial harms and any necessary support for siblings following incidents
- Whether there are any ongoing risks to the victim, other children, adult students, or academy staff
- Any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

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

Making or sharing nudes and semi-nudes by children, including AI-generated images

Hillsgrove Primary School recognises that every incident involving making or sharing nudes and semi-nudes requires a safeguarding response, whether consensual or non-consensual. "Images" includes photographs, videos and livestreams and may include images digitally altered or wholly generated using AI, including deepfakes or "deep nudes"; all concerns will be reported to and dealt with by the DSL (or deputy). When made aware of concerns involving making or sharing nudes and semi-nudes by children, including AI-generated images, staff are advised:

- To report any concerns to the DSL immediately
- Never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL
- Do not delete the imagery or ask the child to delete it
- To avoid saying or doing anything to blame or shame any children involved
- To reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved
- Not to investigate or ask the child(ren) involved to disclose information regarding the imagery
- To not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL

DSLs will respond to concerns in line with the non-statutory UKCIS guidance: 'Sharing nudes and semi-nudes: advice

for education settings working with children and young people' and the local guidance. When made aware of a concern involving making or sharing nudes and semi-nudes, including AI-generated images:

- 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/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 thirteen, 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.

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

Hillsgrove Primary School recognises that both 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. This can be committed or facilitated by an individual or an organised network or gang, and victims may identify as part of that group. Exploitation may constitute modern slavery and referrals will be considered in line with statutory guidance.

Hillsgrove Primary School recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. Children may be criminalised for actions taken under coercion; this does not remove their status as victims or the need for a safeguarding response. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

Hillsgrove Primary School recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship. If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

Serious violence

All staff are 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 academy, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self- harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE. Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. 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. Any concern that a child has carried, used or threatened another person with a knife or other weapon, or is at risk of serious harm, will be brought to the DSL immediately. Risk to the child and others will be assessed and a proportionate safety and support plan put in place, with de-escalation and early evidence-based support where appropriate.

Modern Slavery

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

So-called Honour Based Abuse (HBA)

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. All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted. All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or fmu@fcdo.gov.uk.

Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl. It will be rare for teachers to see visual evidence, and they should not be examining students, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information and FGM Mandatory reporting Duty Fact Sheet. Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Bexley should be informed as appropriate.

Preventing radicalisation

Hillsgrove Primary School recognises that children are vulnerable to extremist ideology and radicalisation. Hillsgrove 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. All staff have received appropriate training to enable them to be alert to changes in children's behaviour which could indicate that they may need help or protection from radicalisation. This includes the Prevent onboarding training completed via our Educare training system.

Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures to follow for making a Prevent referral. If there is an immediate threat, the police will be contacted via 999.

Cybercrime

Hillsgrove Primary School recognises that children with particular skills and interests 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 or a deputy 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 the child protection policy and other appropriate policies.

Domestic abuse

Hillsgrove Primary School recognises that:

- Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents
- Domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual and emotional abuse, stalking, and economic abuse or financial exploitation
- Children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse)
- Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home
- Domestic abuse can take place within different types of relationships, including ex-partners and family members. Child-to-parent or child-to-caregiver abuse can also constitute domestic abuse.
- There is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation
- Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn
- Domestic abuse concerns will not be looked at in isolation and our response will be considered as

part of a holistic approach which takes into account children's lived experiences

If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

Hillsgrove Primary School is part of Operation Encompass.

Mental health

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

Supporting Children Potentially at Greater Risk of Harm

Whilst all children should be protected, Hillsgrove Primary School acknowledges that some groups of children are potentially at greater risk of harm. This can include the following groups. Staff will also be alert to the needs of young carers, recognising that caring responsibilities can affect attendance, attainment, behaviour and wellbeing, and will seek appropriate support at the earliest opportunity.

Safeguarding children with Special Educational Needs or Disabilities (SEND) or medical/physical health conditions

Hillsgrove Primary School acknowledges that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, and additional barriers can exist when recognising abuse, neglect and exploitation. We recognise that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.

All members of staff are encouraged to appropriately explore potential 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 disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying. To address these additional challenges, our academy 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.

Children requiring mental health support

Hillsgrove Primary School has an important role to play in supporting the mental health and wellbeing of our students. 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. Where there are concerns regarding possible mental health problems for/students, staff should: Complete online incident reporting form and speak to a member of the DSL team. Should the child already be supported by a member staff, teachers or leaders should raise additional concerns directly to them. If a member of staff feels a child's mental health is not being supported, despite raising concerns, they should speak directly to the DSL or Mental Health Lead.

Age/ability appropriate education will be provided to our students to help promote positive health, wellbeing, and resilience. This is delivered through our PSHE and RSE healthy minds curriculum.

Children who are absent from education

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

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

Where possible, the academy will hold more than one emergency contact number for each student, so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern. Where the academy/college have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: Children missing education) and local policies.

Elective Home Education (EHE)

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

Children who need a social worker (child in need and child protection plans)

The DSL will hold details of social workers working with children in the academy 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 academy decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

Looked after children, previously looked after children and care leavers

Hillsgrove 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 academy has appointed a 'designated teacher' 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 academy head in the authority that looks after the child. Where the academy believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door. Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

Children who are Lesbian, Gay or Bisexual, and children who are questioning their gender

The fact that a child or a young person may be lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, Hillsgrove Primary School recognises that children who are lesbian, gay or bisexual, or are perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be targeted by other children or others within the wider community. We recognise risks can be compounded where lesbian, gay or bisexual children lack a trusted adult with whom they can be open. These issues are included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

When a child is questioning their gender, Hillsgrove Primary School will follow KCSIE 2026. It is not for the academy to initiate any action regarding social transition. We will take time to understand the child's thoughts, feelings and wider experiences and remain professionally curious about any vulnerabilities, including bullying, mental health needs, neurodiversity and family or peer relationships. Where a child or parent/carer requests support with social transition, decision-making will be documented and parents/carers will be involved as a matter of priority unless doing so would create a greater safeguarding risk; the DSL and relevant professional or clinical advice will be involved as appropriate. The academy will take a very careful approach and, for primary-aged children, support for full social transition would be agreed only very rarely. Any decision will comply with safeguarding duties, the Equality Act 2010 and Human Rights Act 1998 and consider the best interests of the child and other children. Pupils will not use toilets, changing rooms or overnight/residential accommodation designated for the opposite biological sex. Separate toilets will be provided for boys and girls aged 8 and over except for individual lockable toilets intended for one pupil at a time; suitable sex-separated changing/shower arrangements will be provided for pupils aged 11 or over at the start of the school year. Where alternative individual facilities are required, they will not compromise safety, comfort, privacy or dignity and arrangements will be recorded and reviewed. Where single-sex sport is necessary for safety, there will be no exceptions; other participation requests will be considered case by case in line with KCSIE 2026, equality duties, safety and fairness.

Children who are privately fostered

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

Online Safety

This section should be read in conjunction with the Trust / academy processes.

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Hillsgrove Primary School will adopt a whole academy approach to online safety which will empower, protect, and educate our students and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
We will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

Hillsgrove 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, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- Contact: being subjected to harmful online interaction with other users or with generative AI applications that simulate 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 (including making or sharing nudes and semi-nudes, including AI-generated images), sharing other explicit images and online bullying
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams

Hillsgrove Primary School recognises that technology and the risks and harms related to it evolve and change rapidly. The academy will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online. Where generative AI is used, risk assessment and approved use will consider safeguarding, age-appropriateness, ethics, data protection and intellectual property, in line with DfE guidance and Trust policy. The Principal / DSL will be informed of any online safety concerns by the DDSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the local governing body.

Policies and procedures

The DSL has overall responsibility for online safety within the academy but will liaise with other members of staff, for example the Trust's CFOO, IT technicians and curriculum leads as necessary. The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Anti-bullying policy, Behaviour policy, Online Safety Policy and Staff Code of Conduct 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.

All Trust owned devices and systems will be used in accordance with our Acceptable Use of IT policy and with appropriate safety and security measures in place.

Hillsgrove Primary School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities. In line with KCSIE 2026 and DfE guidance, the academy's mobile phone policy will normally prohibit pupils from accessing mobile phones throughout the school day, subject only to agreed exceptions set out in that policy.

Appropriate filtering and monitoring on academy/college devices and networks

Hillsgrove Primary School will do all we reasonably can to limit children's exposure to online harms through academy devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place. When implementing appropriate filtering and monitoring, the academy 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.

Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our/students; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected. Students will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment. Internet use will be supervised by staff as appropriate to pupil age, ability and potential risk of harm.

Responsibilities

The Trust Board alongside the Trust Leadership Team has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed. They work in close conjunction with the Designated Safeguarding Leads to ensure the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

A member of the senior leadership team is responsible for filtering and monitoring, supported by the DSL and IT support. The Safeguarding Link Governor provides oversight and assurance that our academy has met the DfE Filtering and monitoring standards for academies and colleges.

Our senior leadership team are responsible for:

- Procuring filtering and monitoring systems
- Documenting decisions on what is blocked or allowed and why
- Reviewing the effectiveness of our provision
- Overseeing reports
- Ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns
- Ensuring the DSL and IT service providers have sufficient time and support to manage their filtering and monitoring responsibilities

The DSL has lead responsibility for overseeing and acting on:

- Any filtering and monitoring reports
- Any child protection or safeguarding concerns identified
- Checks on the filtering and monitoring system

The IT service providers have technical responsibility for:

- Maintaining filtering and monitoring systems
- Providing filtering and monitoring reports
- Completing technical actions identified following any concerns or checks to systems
- Working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks

All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.

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

Decision making and reviewing our filtering and monitoring provision

When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the Central Finance Team, DSL and the IT service providers. Decisions have been recorded and informed by an approach which ensures our systems meet our academy specific needs and circumstances, including but not limited to our student risk profile and specific technology use. Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.

Our academy will review the effectiveness of filtering and monitoring at least once every academic year. The review will be carried out by the senior leadership team member responsible for filtering and monitoring, with the support of the DSL and IT support. It will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks and any actions. The Trust Leadership Team will retain strategic oversight and assurance.

These checks are achieved by:

- Checks are undertaken by the DSL and DDSL jointly to ensure a minimum of two adults present when completing these
- Checks are undertaken in the Principal's office where confidentiality can be achieved, during

working hours, when students are not present

- Checks are logged/recorded as having taken place on the academy monitoring tracker, any technical concerns are flagged to the IT service provider and safeguarding concerns are actioned by the DSL in line with this policy

Appropriate filtering

Hillsgrove Primary School's education broadband connectivity is provided through LGFL and the academy uses a filtering and monitoring system.

- Industry grade local firewalls
- Sophos Antivirus on workstations and servers
- Cleaned internet feed via JANET
- Webscreen internet filtering

More useful information can be found here: https://national.lgfl.net/security/protectionlayers

Filtering breaches will be reported to the CFOO, DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies. Parents/carers will be informed of filtering breaches involving their child.
Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the Internet Watch Foundation (where there are concerns about child sexual abuse material), Kent Police, NCA-CEOP or BEXLEY Integrated Children's Services.

If staff are teaching topics which could create unusual activity on the filtering and monitoring logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team who will liaise with IT services.

Appropriate monitoring

We will appropriately monitor internet use on all academy provided devices and networks. All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation. If a concern is identified via our monitoring approaches:

- Where the concern relates to students, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies
- Where the concern relates to staff, it will be reported to the Principal and CFOO (CFOO only if the concern relates to the Principal), in line with our staff allegations process.

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

Information security and access management

Hillsgrove Primary School is responsible for information security and access management as part of its wider safeguarding responsibilities. Appropriate security protections will safeguard our systems and the personal information of pupils, staff and others. Further information can be found in our acceptable use policies. We will review the effectiveness of our procedures periodically, in line with DfE cyber security standards, to keep up with evolving cyber-crime technologies.

The Principal and Trust Leadership, are responsible for ensuring that our academy has met the DfE cyber security standards for academies and colleges.

Remote/Online learning

Hillsgrove 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 and any local/national guidance. All communication with students and parents/carers will take place using academy provided or approved communication channels; for example, academy provided email accounts and phone numbers and/or agreed systems; Google Classroom, or Dojo. Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL and CFOO.

Staff and students will engage with remote teaching and learning in line with existing behaviour principles as set out in our academy Behaviour Policy and Acceptable Use Policies. Staff and students 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 process.

Online Safety Training for Staff

Hillsgrove Primary School will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction. Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

Educating students

Hillsgrove Primary School will ensure a comprehensive whole academy curriculum response is in place to enable all students to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

Working with parents/carers

Hillsgrove Primary School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:

- Providing information on our Academy website and through existing communication channels (such as official social media, newsletters) using National Online Safety Resources
- We will ensure parents and carers understand what systems are used to filter and monitor their children's online use at the academy, what their children are being asked to do online, including the sites they will be asked to access and who from the academy (if anyone) their child is going to be interacting with online.

This is achieved by:

- Providing information on our academy website and through existing communication channels (such as official social media, newsletters) about our monitoring systems
- Offering guidance and advice for parents at scheduled events and through newsletters

Where the academy is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.

Staff Engagement and Expectations

Staff awareness, induction and training

All members of staff have been provided with a safeguarding declaration which contains all of the information the Trust requires them to read and understand. Part of this declaration is a copy of Part one of the current version of 'Keeping Children Safe in Education' 2026 which covers safeguarding information for staff. Academy leaders, including the DSL and Governors/Trustees will read KCSIE 2026 in its entirety. All members of staff, including those who do not work directly with children, will read Part one of KCSIE 2026 in full. Academy leaders and staff who work directly with children will also read Annex A of KCSIE 2026, which contains further safeguarding information. All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is stored centrally on our SCR Tracker.

It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements. All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the academy internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners. This is achieved through completion of online safety training through Educare and training completed in person at our academies.

All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. This is achieved through the annual INSET day training in August / September at the start of each year. All staff will be asked to complete the refresher safeguarding module on Educare.

Online safety training for staff will be integrated, aligned and considered as part of the whole academy safeguarding approach and wider staff training and curriculum planning. This is achieved through weekly Safeguarding soundbite CPD and National Online Safety courses. 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.

Hillsgrove Primary School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns daily, and staff are encouraged to contribute to and shape academy safeguarding arrangements and child protection policies. This is achieved via input from knowledgeable and experienced staff leading updates in weekly staff CPD, SLT meetings and the regular SG team meetings.

All Governors and Trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to be assured that our safeguarding policies and procedures are effective and support the delivery of a robust whole academy approach to safeguarding. This training is regularly updated. This is achieved through annual updates at the Local Governing Body meetings as well as the Trust Board meetings.

The DSL and Principal will provide an annual report to the LGB detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

Safer working practices

The Trust has a Safer Working Practices Policy which forms part of the annual safeguarding declaration process. Our academy takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour. All members of staff are required to work within our clear guidelines on safer working practice as outlined in this policy as well as the Staff Code of Conduct.

The DSL will ensure that all staff (including contractors) and volunteers are aware of the academy expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy.

Staff will be made aware of the academy Behaviour and Positive Handling policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any 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 academy policies including staff behaviour policy, and social media.

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 Trust will provide appropriate line management 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.

Safer Recruitment and Allegations Against Staff

Safer recruitment and safeguarding checks

Hillsgrove Primary School is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff. Hillsgrove Primary School will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS). The LGB, Trust Leadership and academy Leadership team are responsible for ensuring that the academy safe recruitment processes as outlined within guidance. The academy will ensure that at least one of the persons who conducts an interview has completed safer recruitment training. Any concerns must be raised immediately with the Central HR Team. In line with KCSIE 2026 and the Crime and Policing Act 2026, a volunteer who teaches, trains, instructs or supervises children frequently, on more than 3 days in a 30-day period, or overnight is in regulated activity and an enhanced DBS check with children's barred list information will be obtained. Existing volunteers brought into regulated activity from 1 September 2026 will have their children's barred list status checked in accordance with KCSIE. For volunteers who are not in regulated activity, the academy will undertake and record a written risk assessment to decide what checks are appropriate; an unchecked volunteer will never be left unsupervised or allowed to undertake regulated activity. For salaried trainee teachers, the academy will ensure all necessary checks are carried out; for fee-funded trainees, written confirmation will be obtained from the initial teacher training provider that the required pre-appointment checks have been completed and the trainee is suitable to work with children.

The academy maintains an accurate Single Central Record (SCR) in line with statutory guidance. We 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 academies. We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings. Where the academy places a student with an alternative provision provider, we continue to be responsible for the safeguarding of that student and will need to satisfy ourselves that the provider can meet the needs of the student. If this is ever necessary, Hillsgrove Primary School will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our academy would otherwise perform in respect of our own staff. The academy will also obtain written confirmation that the alternative provider will inform it of arrangements that may put the child at risk, including staff changes. The academy will know the address of the provider and any subcontracted or satellite sites and will review the placement at least half termly to assure itself that the child is attending, the placement remains safe and the child's needs are met. Any safeguarding concern will trigger an immediate review and, where necessary, termination of the placement unless or until concerns are satisfactorily addressed.

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

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and the local arrangements. Where a concern relates to a trainee teacher, the academy and the training provider share safeguarding responsibilities; the academy will liaise with the provider and with the LADO as appropriate. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the academy from potential false allegations or misunderstandings. Where Principals are unsure how to respond, for example if the academy is unsure of a concern, it must be referred to the CFOO or HRBP immediately. The Principal with the CFOO or HRBP will then, if unsure it meets the harm 'thresholds', seek advice via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service. In all instances where advice is needed Principals must ensure they notify the CFOO immediately.

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Principal with the CFOO (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made. All concerns must be recorded on the Trust system and the CFOO and HRBP must be notified via the Trust system.

In the situation that the academy receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the CFOO and LADO.

Concerns that meet the 'harm threshold'

Hillsgrove Primary School recognises that it is possible for any member of staff, including trainee teachers, volunteers, Governors, 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 an academy or college. This includes when someone has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- 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 responded to and managed in line with Part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Principal who will contact the CFOO and 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 Principal, staff are advised that allegations should be reported to the CFOO who will contact the LADO.

Concerns that do not meet the 'harm threshold'

Hillsgrove Primary School may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our staff code of conduct and forms part of our safeguarding training – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them. Hillsgrove Primary School has an open and transparent culture in which all concerns about all adults working in or on behalf of the academy are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the academy are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

- A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the academy may have acted in a way that is inconsistent with our code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO
- Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings. Low-level concerns should be shared confidentially in line with our Code of Conduct to the Principal. They must also be recorded on the Trust system. Where low-level concerns are reported to the Principal, the Central HR Team will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns. The Principal will share concerns and liaise with the CFOO and LADO.

Low-level concerns shared about supply staff, trainee teachers and contractors will be shared with their employers or training providers, as appropriate, so any potential patterns of inappropriate behaviour can be identified. If the academy is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the CFOO and LADO.

Low-level concerns will be recorded in writing (via the Trust system) and will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 and other relevant policies and procedures (for example data retention policies). Where a pattern is identified, the academy/ Trust will implement appropriate action, for example consulting with the LADO and following our disciplinary procedures.

Safe Culture

As part of our approach to safeguarding, the academy has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, trainee teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately. Staff are encouraged and should feel confident to self- refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded. They should also be reported to the CFOO.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the Academy safeguarding regime. The leadership team at Hillsgrove Primary School will take all concerns or allegations received seriously. All members of staff are made aware of the Trust Whistleblowing Policy. 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.

The Trust 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 person, including a member of staff or volunteer, has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a person, including a member of staff or volunteer, at our academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

Opportunities to Teach Safeguarding

Hillsgrove 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 and Sex Education and Health Education. We recognise that the academy plays 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 students have a range of age-appropriate contacts and strategies to ensure their own protection and that of others. Preventative education will also address age-appropriate online harms, including making or sharing nudes and semi-nudes, AI-generated deepfakes, pornography and the influence of misogynistic content or influencers.

Hillsgrove Primary School recognises the crucial role we must play in preventative education. Preventative education is most effective in the context of a whole academy approach which prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour and other forms of physical violence and conflict. We have a clear set of values and standards, upheld, and demonstrated throughout all aspects of academy life which are underpinned by our Behaviour Policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.

Hillsgrove Primary School recognises that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND. Our academy systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

Physical Safety

Use of 'Positive Handling'

There may be circumstances when it is appropriate for staff to use positive handling to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour policy and Positive Handling Policy, and is in line with the DfE 'Restrictive interventions, including the use of reasonable force, in schools' guidance. Any reasonable force will use no more force than is necessary for the least amount of time, taking account of individual circumstances and the additional vulnerability of children with SEND, mental health problems or medical conditions. Positive and proactive behaviour support and de-escalation will be used to reduce the need for restrictive intervention wherever possible.

The use of academy premises by other organisations

Where our academy facilities or premises are rented/hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe. Where those services or activities are provided under the direct supervision or management of our academy staff, our existing arrangements for child protection, including this policy, will apply. Where services or activities are provided separately by another body using the academy facilities/premises, the Principal and Trust Leadership Team will seek assurance that the provider

concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the academy on these matters where appropriate. 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 (such as a 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.

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 the academy as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors systems and to display a visitor's badge at all times whilst on site.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. Students are aware through assemblies that they need to report concerns to a nearest member of staff. Staff are aware that they can challenge individuals themselves directly and speak to a member of the senior leadership team about their concerns. The academy will not accept the behaviour of any individual (parent or other) that threatens academy 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 academy site.

Local Support

Bexley Safeguarding Partnership (SHIELD) - https://Bexleysafeguardingpartnership.co.uk/ Tel: 0203 045 4320
Email: shield@Bexley.gov.uk

Mash: https://www.Bexley.gov.uk/services/health-and-social-care Tel: 0203 045 5440

LADO and Safer Organisations Advisor Bexley Council
Civic Offices
2 Watling Street Bexleyheath Kent DA6 7AT

Tel: 0203 045 3436 (LADO Team)
Tel: 0203 045 5645 (Business Support) Email: LADO@Bexley.gov.uk
Email: childrens.triageteam@Bexley.cjsm.net

Policy Compliance, monitoring and review

The Trust Leadership and DSL Network will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE 2026. Academy leaders and staff who work directly with children will also be provided with Annex A of KCSIE 2026 as appropriate. These can be found on Edupay.

Parents/carers can obtain a copy of the Hillsgrove Primary School Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via our website Insert link to website here

The policy will be reviewed annually by the Trust Board who has responsibility for oversight of safeguarding and child protection systems.

The Designated Safeguarding Lead and Principal will ensure regular reporting on safeguarding activity and systems to the Trust Board as well as their Local Governing Body. They will not receive details of individual student situations or identifying features of families as part of their oversight responsibility.

Appendix A

Key Contacts

Designated Safeguarding Lead (DSL)	Ms Michele Hilton
Deputy Designated Safeguarding Leads (DDSL)	Ms Kathryn Laurie
Looked After Children Coordinator	Ms Michele Hilton
Mental Health Lead	Mrs Steph Harrison
Safeguarding Link Governor	Mrs Ursula Ayliffe
Trust Safeguarding Lead	Mrs S Bridges

Appendix B

Related Policies and documents

Business Continuity Plan including lockdown, fire evacuation Complaints
Confidential risk assessments Staff Code of Conduct Behaviour Policy
Searching, screening and confiscation Anti-Bullying
Positive Handling Acceptable Use of ICT Data Protection
Relationship and Sex Education Health and Safety
Attendance
Managing allegations against adults
Safer working practices Whistleblowing
Safer Recruitment
First aid and accidents, including medication and managing illnesses, allergies, health and infection Personal and intimate care
Social media and Image Use

Appendix C

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.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

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

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)

- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible
- explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe an adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care- givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

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

Appendix D

Support Organisations

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
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: https://swgfl.org.uk/harmful-sexual-behaviour- support-service

Support for pupils/students

- 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: https://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
- NSPCC https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send
- NSPCC https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors

Contextual Safeguarding Network: https://contextualsafeguarding.org.uk/ Kent Resilience Hub:

https://kentresiliencehub.org.uk/

Children with Family Members in Prison

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

Substance Misuse

- We are with you : 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
- Operation Encompass: https://www.operationencompass.org/
- 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
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- Multi-agency practice principles for responding to child exploitation and extra-familial harm: https://tce.researchinpractice.org.uk/

Honour Based Abuse

- Karma Nirvana: https://karmanirvana.org.uk
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/media/5c7e9d1440f0b6333380e4ee/FGM_The_Facts_A6_v4_web.pdf
- Mandatory reporting of female genital mutilation: procedural information: https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage: https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

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
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.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
- 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: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/ academys-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