



HILLTOP
PRIMARY SCHOOL

Safeguarding and Child Protection Policy

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Statement of Equality

We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.



What to do if you have a concern about a child at Hilltop?

Why are you concerned?

- For example
 - Allegation/ child shares a concern or worry
 - Indicators of abuse or neglect

Immediately record your concerns

- Follow the school's procedure and report via MyConcern
 - Reassure the child
 - Clarify concerns if necessary (**TED: Tell, Explain, Describe**)
 - Use child's own words/ use facts
 - Sign and date your records

Inform the Designated Safeguarding Lead **Simi Sodhi, Deputy Headteacher, sgill74@hilltopprimary.co.uk**

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the MSCP [Threshold Guidance](#) for further guidance.
- If the child is at **imminent risk of harm** a referral will be made to First Response – 01634 334466
- If the child is **NOT** at imminent risk, then a referral will be made via [\(the portal\)](#)
- If unsure then consult with the First Response 'No Name Consultation line' 9:30 – 12:30 (01634 33 1662) or First Response on 01634 33 4466

If you are unhappy with the response Staff:

- Follow [MSCP escalation procedures](#)
- Follow Whistleblowing procedures

Pupils and Parents:

- Follow school complaints procedures

Record decision making and action taken in the pupil/student's Child Protection/safeguarding file

Monitor - Be clear about:

- What **ACTION** you have taken at the time of reporting the concerns.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support (if necessary)

At all stages the child's circumstances will be kept under review
The DSL/Staff will request further support if required to ensure the **child's safety is paramount**

Introduction and Ethos

- Hilltop Primary Academy recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- Hilltop Primary Academy recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- Our school acknowledges the need to treat everyone with equity, with fairness, dignity and respect. We recognise that unconscious bias may impact upon our perceptions and expectations of children, particularly those from minority groups and that this may influence the safeguarding actions we take. We seek to educate and challenge all members of the school community to address equality of access and opportunity for all children, by highlighting inequalities and increasing awareness.
- Staff challenge any form of derogatory and sexualised language or behaviour. They are vigilant to sexualised/aggressive touching/grabbing. We recognise that groups at particular risk include pupils who identify as Lesbian, Gay, Bisexual, Transgender Queer+ (LGBTQ+), or are perceived by peers to be LGBTQ+, and pupils/students with SEND. We recognise that these children can be targeted by other children and acknowledge the importance of a safe space for them to speak out or share their concerns with members of staff. Pupils/students are protected from up-skirting, bullying (including cyberbullying), homophobic, biphobic and transphobic behaviour, racism, sexism, and all other forms of discrimination. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.
- Through their day-to-day contact with pupils and their direct work with families, all staff and volunteers in school have a crucial role to play in noticing indicators of possible abuse or neglect at an early stage. Our school may be the only secure, stable, and predictable element in their lives.
- Hilltop Primary Academy will endeavour to support the welfare and safety of all pupils through:
 - Ensuring that the child's welfare is of paramount importance.
 - Training all staff to recognise the signs and symptoms of abuse and to know the school's procedures and lines of communication.
 - Ensuring that children's mental and physical health, or development, is not impaired.
 - Providing children, a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (Relationships and Sex Education) and Computing (online safety) to help pupils stay safe, recognise when they don't feel safe and identify who they might / can talk to.



- Working with parents to ensure they understand the school's legal responsibility to safeguard and ensure the welfare of all children, including the need for referral to other agencies in some situations.
 - Keeping confidential records that are stored securely, and shared appropriately with other professionals.
 - Ensuring the voice of the child is evident in individual case files and informs the school's policy developments.
 - Ensuring that the school practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors and contractors.
 - Informing parents about expected behaviour.
- Hilltop Primary Academy expects that if any member of our community has a safeguarding concern about any child or adult, they will act immediately.
 - This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2024 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
 - The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2024.

Policy Context

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022



Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2024) 'Keeping children safe in education 2024'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
 - DfE (2017) 'Child sexual exploitation'
 - DfE (2024) 'Information sharing'
 - DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
 - DfE (2021) 'Teachers' Standards'
 - DfE (2024) 'Recruit teachers from overseas'
 - DfE (2024) 'Working together to improve school attendance'
 - DfE (2024) 'Meeting digital and technology standards in schools and colleges'
 - Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
- [Sections 175 and 157 of the Education Act 2002](#) require school governing bodies, proprietors, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

Definition of Safeguarding

For the purposes of this policy, "**safeguarding and protecting the welfare of children**" is defined as:

- Providing help and support to meet the needs of pupils as soon as problems emerge.
- Protecting pupils from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of pupils' mental and physical health or development.



- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.
- Hilltop Primary Academy acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Children with family members in prison
 - Children Missing Education (CME)
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness
 - Human trafficking and modern slavery
 - Mental health
 - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
 - Online safety
 - Child-on-child abuse
 - Preventing radicalisation and extremism
 - Private fostering
 - Relationship abuse
 - Serious Violence
 - Sexual Violence and Sexual Harassment
 - So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
 - Up-skirting

(Also see Annex B within ‘Keeping children Safe in Education’ 2024 p.140)

Policy Compliance, Monitoring and Review

- Hilltop Primary Academy will review this policy at least annually. The policy will be revised following any national or local policy updates, any significant national events, local child protection concerns and/or any changes to our procedures.
- The Governing Body has strategic leadership responsibility for Hilltop Primary Academy safeguarding arrangements ensure that the school complies with their duties under legislation. They ensure policies, procedures and training in the school is effective and



complies with the law at all times

- The Designated Safeguarding Leads / Headteacher will ensure regular reporting on safeguarding activity and systems in school to the Governing Body. The Governing Body will not receive details of individual situations or identifying features of families as part of their oversight.
- This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

Key Responsibilities

Governing Body

- The Governing Body and staff have read, understood and will follow Keeping Children Safe in Education 2024.
- The Governing Body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Governing Body will ensure that all governors/ trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will be regularly updated. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.
- Lynda Hammond is the nominated governor for safeguarding, who will take the lead role in ensuring that the school has an effective policy which interlinks with 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 Governing Body/Proprietor will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- The Governing Body/Proprietor will regularly review the effectiveness of school filtering and monitoring systems. They will ensure that the leadership team and relevant staff are:
 - aware of and understand the systems in place
 - manage them effectively
 - know how to escalate concerns when identified.
- The Governing Body, Headteacher and Leadership Team will ensure that the DSL is suitably supported in their role and has the appropriate status, authority, funding, resources, and training and is assured that the DSL understands they have the responsibility in leading safeguarding and child protection across the school.

Designated Safeguarding Lead (DSL)

- The Designated Safeguarding lead will carry out their roles in accordance with Keeping Children Safe in Education 2024.
- The school has appointed Simi Sodhi as the Designated Safeguarding Lead (DSL), she is a member of the senior leadership team. The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school.
- Hilltop Primary Academy has appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.
 - Ewa Eddy (Headteacher)
 - Rachel Harris (FLO)
 - Katie Osmond (SENCo)
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate **lead responsibility** for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The Designated Safeguarding Lead and any deputies will undergo appropriate training to provide them with the knowledge and skills required to carry out their role.
- The headteacher will be kept informed of any significant issues by the DSL.
- The DSL and any deputy DSL's training will be updated formally every **two years**, but their knowledge and skills will be updated through a variety of methods (e-bulletins, conferences, local meetings, other training etc.) at regular intervals and **at least annually**, to keep up with any developments relevant to their role.
- Availability - during term time the DSL (or a DDSL) will always be available (during school hours) for school staff to discuss any safeguarding concerns. Adequate and appropriate cover arrangements will be made for any out of hours/out of term activities
- During school holidays, the DSL will provide appropriate emergency contact details to the MASH Education Lead on the understanding that these will only be used if absolutely necessary and will not be shared elsewhere.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

It is the role of the DSL to:

- Act as main contact point for all school staff to discuss any safeguarding concerns.
- Manage and maintain the confidential paper/electronic case management systems to record concerns about pupils/students to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.
- Coordinate safeguarding action for individual children. In the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
- liaise with the headteacher or principal to inform them of 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. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)

- To liaise with safeguarding partners, other agencies, and staff in line with KCSIE 2024 and WTSC 2018.
- Ensure that Medway referral procedures are followed as necessary (see referral process page 2).
- As required, represent and liaise appropriately with other professionals and ensure the school is represented at multi-agency safeguarding meetings (including child protection conferences).
- Act as a source of support, advice and expertise for all staff during term time for staff in the school to be able to discuss any safeguarding concerns.
- Understand the importance of information sharing both within the school and with other schools and agencies.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff this will assist with any measures the school may put in place to protect them.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education 2024

For further details and information about the DSL role please refer to KCSIE 2024 **Annex C p.170**

Members of Staff

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn and promote the child's welfare
- Maintain an attitude of '**it could happen here**' where safeguarding is concerned and to always act in the best interests of the child
- Understand the early help process and their role in it.
- Be aware of the indicators of abuse and neglect, so they can identify cases of children who may be in need of help or protection.
- Understand that children may not feel ready to, or know how to, tell someone they are being abused, exploited, or neglected and/or that they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or
- sexual orientation or language barriers. They may feel embarrassed, humiliated or be being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns any about a child.
- Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
- Know how to maintain an appropriate level of confidentiality.



- Understand and comply with this policy and understand other safeguarding policies and systems.
- To undertake regular and appropriate training, that is regularly updated.
- Be aware of, and take appropriate action to raise concerns, about poor or unsafe practice, or potential failures in the school safeguarding regime. (This may include accessing the school whistleblowing policy)
- Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

Children and Young People

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

- Contribute to the development of school safeguarding policies.
- Report abuse confidently, knowing concerns will be taken seriously and that they will be listened to and effective action will be taken.
- Seek help from a trusted adult and feel listened to.
- Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online.

Parents and Carers

Parents/carers have a responsibility to:

- Work in partnership with the school to safeguard and promote the welfare of child/ren and understand Hilltop Primary Academy's statutory responsibilities in this area.
- Read and adhere to the relevant school/policies and procedures.
- Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm, including online
- Seek help and support from the school, or other appropriate agencies.
- We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to safeguard a child/ren.

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



Recognising Indicators of Abuse and Neglect

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

- As a school we are aware that abuse, neglect and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another, for further guidance: [Responding to Abuse and Neglect](#) . This is outlined locally with the [Medway Threshold Guidance](#)
- Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or a deputy).
- All staff in school should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
 - **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.
 - **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.
 - **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.
 - **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.

The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1 of this document. Staff should also refer to [What to do if you are worried a child is being abused 2018](#).

- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. Indicators of abuse and neglect do not automatically mean a child is being abused, however all concerns should be taken seriously and explored by the DSL on a case-by-case basis.
- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child, might be normal for an older child.
- Hilltop Primary Academy recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- All staff, but especially the Designated Safeguarding Lead (and deputies), should consider

whether children are 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, and serious youth violence.

- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol, or if there is a sudden change in their mental health.
- 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.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

Hilltop Primary school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

Specific Safeguarding Issues

- Hilltop Primary Academy is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.
- Hilltop Primary Academy staff are mindful 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 local authority children's social care (such as a Child in Need, or Child Protection, plan).
- All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sharing nudes or semi-nude images (also known as youth produced sexual imagery) put children in danger. The categories/issues that follow are by no means an exhaustive list, but give an indication of the current themes in safeguarding and protecting children.

Child-on-Child Abuse

- Hilltop Primary Academy recognises that children are capable of abusing their peers. This is referred to as child-on-child abuse (see separate policy) and can take many forms.
- Hilltop Primary Academy believes that abuse is abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.
- Hilltop Primary Academy recognises that child-on-child abuse can take many forms, including but not limited to:
 - bullying, including cyberbullying
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - verbal abuse
 - sexual violence and sexual harassment

- ‘up-skirting’, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm
 - nude or semi-nude image sharing (also known as ‘sexting’ or youth produced/involved sexual imagery)
 - initiation/hazing type violence and rituals
- Staff and leadership recognise that that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, (i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all child-on-child abuse is unacceptable and all reports will be taken seriously.
 - In order to minimise the risk of child-on-child abuse, we will implement a robust anti-bullying policy, provide an age appropriate PSHE and RSE curriculum and ensure children have access to a range of reporting mechanisms.
 - Hilltop Primary Academy will not tolerate, dismiss or minimise any harmful behaviours in school and will take swift action to intervene when this occurs. All allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with associated school/college policies, including child protection, anti-bullying and behaviour.
 - Alleged victims, perpetrators and any other child affected by child-on-child abuse may be supported by the school taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, and in cases of sexual assault, informing the police and/or First Response.
 - The school will take steps to ensure that appropriate curriculum time is dedicated to enabling children to develop an awareness and understanding of abusive behaviour and minimise the risk of all forms of child-on-child abuse. We will also ensure that children recognise warning signs and what support is available, both within the school and externally (such as Kent Police, ChildLine etc.).

Child on Child Sexual Violence or Harassment

- Hilltop Primary Academy follows the guidance outlined in part five of KCSIE 2024 which has now merged with the content of DfE guidance [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#). When responding to concerns relating to child-on-child sexual violence or harassment
 - If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.
- Hilltop Primary Academy recognises that staff must be vigilant and recognise that information may come from overheard conversations or observed behaviour changes.



- It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or be made to feel ashamed for making a report.
- Immediate consideration will be given as how to best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment. 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, all other children, staff and any actions that are required to protect them.
- Where possible, KCSIE 2024 recommends that two members of staff manage reports of sexual violence and harassment.
- Reports will initially be managed internally by Hilltop Primary Academy and where necessary will be referred to Children's Services and/or the Police.
- The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off, or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or Hilltop Primary Academy staff; and, any other related issues or wider context.
- We will reassure and teach our pupils/students to understand that the law is in place to protect children and young people, rather than criminalise them.
- Hilltop Primary Academy will regularly review decisions and actions to update and improve policies and practice.
- The school will consider the physical and mental health implications for both the victim and perpetrator. It is identified that both individuals will need additional support and provision of further information about harmful sexual behaviours, and may need signposting to further sources of support.

Nude and/or Semi-Nude Image Sharing by Children

- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Updated December 2020)
- The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.
- When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:



- Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g., if a child has shown it to them), this must be immediately reported to the DSL.
 - Not delete the imagery, or ask the young person to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- Hilltop Primary Academy recognises that nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or “sexting”) is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
 - the DSL will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate.
 - parents and carers will be informed at an early stage and involved in the process of supporting their children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - a referral will be made to Children’s Services 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 or SEND).
 - the image/videos involve sexual acts and a child under the age of 13,
 - depict sexual acts which are unusual for the child’s developmental stage,
 - are violent, or
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
 - All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time, if further information/concerns are disclosed.
 - If DSLs are unsure how to proceed, advice will be sought from Children Services.

Gangs, County Lines, Serious Violence, Crime and Exploitation

- Hilltop Primary Academy acknowledges the impact of gangs, county lines, serious violence, crime and exploitation and relevant concerns will be reported and responded to in line with



other child protection concerns.

- The initial response to a child victim is important and staff will take any allegations seriously and work in ways that support children and keeps them safe.

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

- Hilltop Primary Academy recognises both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- Whilst age may be the most obvious, power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.
- The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.
- Sexual exploitation can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to. To support in identifying the signs of child sexual exploitation please refer to the Kent and Medway [Exploitation Identification Tool](#) and the MSCP Risk [Assessment tool for sexually active young people](#).

Gangs, County Lines and Serious Violence

- Criminal exploitation of young and vulnerable people is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace this is commonly referred to as cuckooing.
- All staff have been trained and recognise the need to be vigilant for the signs and aware of risk factors which may increase the likelihood of involvement in serious violence, exploitation, and gang activity including but not limited to:
 - Being male – however professionals need to be aware that girls are also likely to be exploited. indicators for girls who are exploited can be very different to those for boys.
 - Children who associate with other young people involved in exploitation.
 - Children who go missing for periods of time or regularly come home late.
 - Change in friendships/relationships with others/groups.
 - Having been frequently absent or permanently excluded from school.
 - Having experienced child maltreatment.



- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- Signs of self-harm/significant change in wellbeing
- Involvement in offending, such as theft or robbery

Further advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance. County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

- Hilltop Primary Academy will make referrals to Children's Services and the police if we have reason to believe a student has become involved in these types of activity.
- In addition, where an exploitation concern has been identified, the form linked below will also be completed, to provide intelligence to the police on local exploitation concerns and issues. The portal allows for the reporting of suspected perpetrators of child exploitation and Places and Spaces where Child Exploitation is suspected of taking place and vehicles believed to be connected to be exploiting children. [Report an Exploitation Concern Online](#).

This is for Child Exploitation specifically. General vulnerability concerns still need to be reported directly to the police (101 or 999).

Please note, this portal is also not suitable for reporting crime as is not constantly monitored

Mental Health

- Hilltop Primary Academy will ensure that all staff have an awareness of mental health problems and be aware that in some cases they can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these experiences can impact on children's mental health, behaviour, and education.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are '**well placed**' to identify behaviour indicating a mental health problem or being at risk of developing one.
- If staff have a concern about a child's mental health, that is also a safeguarding concern, immediate action will be taken, following the reporting procedures in this policy.

Online Safety

It is recognised by Hilltop Primary Academy that the use of technology presents challenges and risks to children and adults both inside and outside of school.

- The use of technology has become a significant component of many safeguarding issues. For example, technology often provides the platform that facilitates harm in cases of child exploitation; radicalisation; sexual predation and bullying.
- Hilltop Primary Academy will empower, protect and educate the whole school community in the use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff.
- The DSL and leadership team and Governing Body have read, understood and acted upon all guidance regarding Online Safety within 'Keeping Children Safe in Education' 2024
- Hilltop Primary Academy identifies the breadth of issues within online safety can be considerable, but they can be broadly categorised into four areas of risk:
 - **Content:** being exposed to illegal, inappropriate or harmful material
 - **Contact:** being subjected to harmful online interaction with other users
 - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
 - **Commerce** – being exposed to online gambling, inappropriate advertising, phishing and or financial scams.
- Hilltop Primary Academy recognises the specific risks posed by mobile phones and cameras, and, in accordance with KCSIE 2024, has appropriate policies in place that are shared and understood by all members of the school community.
- Hilltop Primary Academy uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet and email systems.
- All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place
- All members of staff have access to appropriate, regular and up-to-date online safety information as part of their safeguarding training.

- Hilltop Primary Academy ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.
- Hilltop Primary Academy ensures that appropriate filtering and monitoring systems are in place on school equipment and systems used by pupils and staff, including school devices used by pupils at home.
- Filtering and monitoring are an important part of school's online safety responsibilities, but they are only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control, such as mobile phones and other internet enabled devices and technology. Where concerns are identified, appropriate action will be taken.



- Hilltop Primary Academy recognises that many pupils and parents will have unlimited and unrestricted access to the internet via mobile phones and other enabled devices, this is external to the school's control. Where concerns are identified appropriate action will be taken.
- Hilltop Primary Academy will ensure a comprehensive whole school curriculum is developed and in place to enable and equip all pupils with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world and manage the risks effectively.
- The school will also support parents and the wider school community (including all members of staff) to be aware and alert to the need to keep children safe online. We will share information with parents/carers about:
 - what systems are in place to filter and monitor online use,
 - what children do online as a part of their learning, including the sites they may be asked to access,
 - who from the school or college (if anyone) their child is going to be interacting with online, as a part of remote learning.
- The DSL will respond to online safety concerns in line with this and other associated policies such as anti-bullying and behaviour.
 - 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.

Where children are asked to learn online at home in response to a full or partial closure:

- Hilltop Primary Academy will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using Hilltop Primary Academy provided or approved communication channels; for example, Hilltop Primary Academy provided email accounts and phone numbers and agreed systems e.g. MS Teams.
- Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour policy.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with this and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP) which is available upon request.
- Parents/carers will be made aware of what their children are being asked to do online,



including the sites they will be asked to access. Hilltop Primary Academy will be informed of who from the school their child is going to be interacting with online.

- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.

Children Missing Education (CME) and Persistently Absent Children

- All staff should be aware of children going **missing** and who are **absent from education, particularly on repeat occasions and/or prolonged periods** this can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.
- Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.
- Hilltop Primary Academy recognises that, when a child is not in school, they may be susceptible to, or exposed to, other risks, so we work with parents and other partners to keep children in school whenever possible.
- Staff are aware of the school's Unauthorised Absence and Children Missing from Education Procedures- a copy of these procedures is available upon request.

Domestic Abuse

- Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it in their own intimate relationships, can have a serious, long-lasting, impact upon children and is a form of child abuse.
- Hilltop Primary Academy recognises that domestic abuse can encompass, but is not limited to psychological; physical; sexual; financial; and emotional abuse.
- In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

So-called 'Honour-Based' Abuse

- So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed in the belief that they protect or defend the honour of the family and/or the



community. These abuses may include female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators.

- All staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should immediately follow the school’s concern reporting procedures and speak to the Designated Safeguarding Lead (or deputy). As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s services. Where FGM has taken place, since 31 October 2015 there has been a **mandatory reporting duty** placed on **teachers** that requires a different approach (see following section).

Female Genital Mutilation (FGM):

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- 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**, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students.
- The duty does not apply in relation to ‘at risk of’ or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty [FGM Fact Sheet](#)
- Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s Designated Safeguarding Lead (or deputy) and involve children’s social care as appropriate.

Forced Marriage

- Hilltop Primary Academy recognise that since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if **no** violence, threats or another form of coercion are used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages. (see page 155 of KCSIE 23)



- Multi-agency statutory guidance for dealing with forced marriage, which can be found at [The right to choose: government guidance on forced marriage](#). Guidance for schools can be found in Section 8. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.
- Staff at Hilltop Primary Academy will use the school's concern reporting system if they have any reason to believe that a child may be at risk of being taken out of the country for the purposes of a forced marriage.

Breast Ironing

- Breast flattening is a form of child abuse. See the CPS legal guidance on [Child Abuse](#)
- Breast Ironing is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down using hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education
- There are potentially significant physical and psychological consequences and risks related to this practice. Breast flattening is a form of child abuse. Therefore, professionals must follow their Local Safeguarding Children's Board Procedures.

Preventing radicalisation

- The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.
- Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.
- Every member of staff at Hilltop Primary Academy recognises that protecting children exposed to radicalisation and extremism is the same as safeguarding against any other vulnerability and should be approached in the same way.
- All staff and governors should complete the [Prevent online Awareness training](#) package developed by the Home Office which includes guidance on how to identify people who may



be susceptible to being drawn into terrorism, and how to refer them into the Channel process.

Looked after children, previously looked after children and care leavers

- Hilltop Primary Academy acknowledges and understand the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child potentially remains vulnerable.
- The school has a '[designated teacher](#)' (**Simi Sodhi, Deputy Headteacher**) 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.
- Hilltop Primary Academy understands their responsibility to inform the Local Authority via First Response, of Private fostering arrangements when they believe that a child is being cared for as part of a private fostering arrangement. (When a child under 16, or 18 if they are disabled, is cared for and lives with an adult who is not a close relative for 28 days or more.)

Child Protection Procedures

- Hilltop Primary Academy adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website <https://www.medwayscp.org.uk/mscb/>
- If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 3 for the flow chart setting out the concern reporting process for staff.
- If a child is at risk of imminent danger or harm concerns will need to be referred by telephone to **First Response 01634 334466** and/or the police. **If it is an emergency the police need to be called on 999.**
- **If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.**
- **Less urgent concerns or requests for support will be referred to Children's social care and Early Help via the Medway online form ([the portal](#))**
- Once staff have reported their concerns, the DSL will make a decision about what action to take, these include:
 - continuing to closely monitor the situation
 - managing any support for the child internally, via the school's own pastoral support



processes.

- a referral to Family Solutions or for an Early Help Assessment
- a referral to Children's Services for statutory intervention.

All information and actions taken including the reasons for any decision/actions made, will be fully documented on a child's record. Actions will be assigned to a specific member of the safeguarding team and will have a review date

- All staff are aware of the process for making contact with Children's Services for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Wherever possible, the school will share safeguarding concerns, or the intention to refer a child to Children's Services, with parents or carers. **However staff will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation.** On occasions it may be necessary to consult with First Response and/ or the police for advice on when to share information with parents/carers.
- If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the **'No Name' consultation line at Medway First Response (9:30-12:30) on 01634 33 1662.** If anyone other than the DSL makes a referral to external services, then they will inform the DSL, and Headteacher, as soon as possible.
- Staff may pass information about a child to the DSL, but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL, so they can reassure themselves the child is safe and their welfare is being considered. If, in following this process, the staff member remains concerned, it is their responsibility to follow the school's escalation or whistleblowing process.
- If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.
- 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 [MSCP 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.
- All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to First Response if the situation does not appear to be improving or is getting worse (in liaison with the early help practitioner).
- Hilltop Primary Academy is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All



staff know what Operation Encompass is, and there is a clear process for managing notifications in school [all notifications from Operation Encompass are added to My Concern and an update is shared with the staff who work with the named child].

- The child's wishes - Systems are in place for children to express their views and give feedback. All systems and processes operate with the **best** interests of the child at their heart. **However this should not prevent safeguarding action being taken, for the child or children involved.**

Record Keeping

- Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern about a child or children within our school and when these records should be shared with other agencies.
- All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing on the school's safeguarding system (My Concern).
- Child Protection records will usually record facts and not personal opinions. If a staff member records an opinion, this should be made explicit in the recording.
- A body map will be completed if injuries or marks have been observed.
- Photographs of injuries should **NOT** be taken by staff; staff should use body maps to detail concerns. Taking photos of injuries can be traumatic and distressing for children and staff. Staff should not examine a child and should only record what they can see.
- If photos of injuries are required for evidence purposes, this should be directed/carried out by the Police. If you are asked to take photos of an injury by a social worker or police officer clearly state in the records who asked you to do this, name, date, time, and ensure you record the individuals rationale behind this decision. Staff can challenge this request if they do not feel comfortable and wait for a Social worker/ Police officer to attend.
- Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff making the report. If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are highly confidential and shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL, within 5 days of the child starting at their new school and a receipt of delivery will be obtained.

Child Protection files

- Where children leave the school or college (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be done separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs, or the named person with oversight for SEN in colleges, are aware as required.
- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and to have that support in place for when the child arrives
- If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person, to ensure there is effective transition and handover of information.
- Child protection files should always be kept by the education setting where the child is on role. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they do they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc.

Multi-agency Working

- Hilltop Primary Academy identifies that they have a pivotal role in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018.
- Hilltop Primary Academy recognises and is committed to its responsibility to work within the MSCP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative relationships with professionals in other agencies, in line with statutory guidance.
- Hilltop Primary Academy will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.
- Hilltop Primary Academy recognises the importance of multi-agency working, and will provide requested reports and support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or early help



multi-agency meetings.

Confidentiality and Information Sharing

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.
- Hilltop Primary Academy expects all staff to treat information they receive about a children and young people in a highly discreet and confidential manner. Confidential information should **never** be used casually in conversation or shared with any person other than a on '**need to know basis**'.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies Hilltop Primary Academy recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2024.
- The Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection, yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. DfE '[Information sharing advice for safeguarding practitioners](#)' (2018) provides further detail.
- Hilltop Primary Academy has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school/college is complaint with all matters relating to confidentiality and information sharing requirements. Tom Heyes (DPO) can be contacted at: theyes@beyondschools.co.uk.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

Complaints

- Hilltop Primary Academy has a complaints procedure which can be found on our website and on request from the office. As a school we encourage children and families to raise complaints, concerns or comments with us. We have a robust internal investigation process.
- Safeguarding concerns should be raised with school immediately. If a child is at immediate risk, then the individual needs to contact First Response 01634 334466 or the police on 101. All visitors are given a safeguarding leaflet that outlines how to share concerns and the code of conduct expected by visitors/contractors.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 19 of this policy.

Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part One of “*Keeping Children Safe in Education*” (2024) which covers Safeguarding information for all staff.
- School leaders and all members of staff who work directly with children will read Annex B within Keeping Children Safe in Education 2024.
- School leaders and governors including the DSL will have a thorough awareness of the entirety of KCSIE.
- All Members of staff sign to confirm that they have read and understood Part One and Annex B (or Annex A if deemed appropriate) of KCSIE. This information is held by HR (single central record).
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information to ensure they are aware of the Hilltop Primary Academy internal safeguarding processes as part of their induction. This includes in person training with a DSL and a visitor leaflet detailing out safeguarding procedures.
- All staff undergo safeguarding and child protection training (including online safety) at induction. The training is regularly updated. Induction and training is in line with advice from the Medway Safeguarding Children Partnership.
- In addition to safeguarding training, all members of staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including temporary/supply staff) will be made aware of the school’s expectations regarding safe and professional practice via the staff handbook and Acceptable Use Policy.
- The Governing Body recognises the expertise staff build through undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore

be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

- The DSL and Head Teacher will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.
- Hilltop Primary Academy has a nominated Safeguarding lead for the Governing Body (Lynda Hammond), who ensures that all members of the Governing Body access appropriate safeguarding training covering their specific strategic responsibilities, at induction and on a regular basis. Training will provide them with the knowledge to ensure their school's safeguarding policies and procedures are effective. This includes governors' strategic responsibility for online safety.

Safe Working Practice

- All members of staff are required to work within clear guidelines on Safe Working Practice / the school's Code of Conduct. The DSL will ensure that all staff and volunteers have read this policy and staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- Staff should be aware of the school's **Behaviour Management and Physical Intervention Policies**, and any physical interventions must be in line with agreed policy and procedures and national guidance.
- A list of staff who have accessed physical intervention training will be kept by the Headteacher/Designated Safeguarding Lead and updated in-line with [use of reasonable force](#) DfE guidance. All incidents will be recorded in line with guidance.
- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour Policy (available upon request).
- If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with, for how long. Doors, ideally, should have a clear glass panel in them and be left open.
- Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in [Guidance for safer working practice for those working with children and young people in education settings May 2019](#) (Safer Recruitment consortium). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise



themselves with advice and professional expectations outlined in the school's E-Safety Policy.

Staff Supervision and Support

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

Safer Recruitment

- Hilltop Primary Academy values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils/students and staff.
- Hilltop Primary Academy will use the recruitment and selection process to deter, identify and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information this will aid the school in deciding about the suitability of the prospective employee.
- The school will carry out an online search on shortlisted candidates to help identify any issues that are publicly available online which may be relevant to their suitability to work with children and/or may have an impact on the school/academy's reputation.
- The Governing Body will ensure that at least one of the persons who conducts the interview has completed safer recruitment training. At all times the Headteacher and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education', DfE (2024).
- Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: [Safeguarding Children and Safer Recruitment](#))



- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Where appropriate 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 schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- Where the school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child. The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Allegations Against Members of Staff, including Supply Staff, Contractors and Volunteers

- Hilltop Primary Academy recognises that allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- All staff, contractors and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team.
- Hilltop Primary Academy understands the duty to refer to the LADO where it is alleged that anyone working in the school 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; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- In depth information regarding staff allegations can be found within our Procedures for Managing Allegations against Staff policy (available upon request). All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the schools safeguarding regime. The leadership team at Hilltop Primary Academy will take all concerns or allegations received seriously.
- If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:
 - Allegations should be referred immediately to the Head Teacher or deputy in their absence who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Please refer to the Medway [LADO Leaflet](#) if you need further information.

- In the event of allegations of abuse being made against the Headteacher then staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO in the first instance.
 - Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors should contact **the LADO directly on 01634 331065**.
 - The Headteacher or Chair of Governors will seek advice from the LADO within 24 hours of the alleged incident. No member of staff or the Governing Body will undertake further investigations before receiving advice from the LADO.
- Where headteachers are unsure how to respond, for example if the school is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service
 - It has a legal duty to refer to the [Disclosure and Barring](#) Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

Concerns that do not meet the 'harms threshold'

- Hilltop Primary Academy Staff Code of Conduct explains what a low-level concern is and the importance of sharing concerns. We have a clear reporting procedures for children, parents and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. Procedures in place for confidentially sharing, recording and handling of low-level concerns.
- A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt') that a member of staff has acted in a way that:
 - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
 - does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse.
- Where low-level concerns are reported, the headteacher/principal should liaise with the LADO Service on 01634 331 065



- The Medway LADO policy states that all allegations, including low level are considered with the LADO, please communicate and engage with the LADO in relation to all low-level concerns.

Whistleblowing Procedure

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team. All members of staff are made aware of the school's Whistleblowing procedure (available upon request). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- 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.

Safeguarding Children with Special Educational Needs and Disabilities

- Hilltop Primary Academy understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These children may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the SENDco to plan support as required.
- All staff will ensure that children with SEN and disabilities will be able to overcome the barriers that exist for this group of children and specifically ensure that those with communication difficulties will be supported to make sure that their voice is listened to and acted upon.
- It is important that all staff are aware that children with SEN and disabilities may not always outwardly display indicators of abuse and that some children can be disproportionately impacted by things like bullying and exploitation without outwardly showing signs.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities.

Curriculum and Staying Safe

- [Working Together to Safeguard Children \(2018\)](#) states that the curriculum should ensure opportunities for "developing children's understanding, awareness and resilience".



- Schools play a pivotal and 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.
- The school uses the PSHE and RSE curriculum to increase self-esteem, self-awareness and social and emotional understanding, assertiveness and decision making this ensures that our pupils have a range of strategies to ensure their own protection and that they are able to also protect others. Online safety is also integrated into the curriculum
- The school ensures that teachers that teach the PSHE curriculum have been trained and equipped to deliver high quality PSHE education in a safe way.
- Children feel they can talk to a range of staff when they feel they are worried and can feedback about their school experience. Children at Hilltop Primary Academy will be listened to, heard and their concerns will be taken seriously and acted upon as appropriate.
- Other systems that exist outside of expected day to day classroom interaction and support include: anti-bullying ambassadors, pupil voice and RECIPE Ambassadors.

The Use of School Premises by Other Organisations

- Services or activities provided separately by another organisation from time to time may seek to use the school premises. The Headteacher or Governing Body will seek written assurance that the organisations concerned have suitable policies and procedures in place regarding safeguarding children and that relevant safeguarding checks have been made for all staff and volunteers.
- The governing body will therefore seek assurance that the body 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 to liaise with the school or college on these matters where appropriate.
- Without this assurance then an application to use the premises will be refused
- If Hilltop Primary Academy receives an allegation relating to an incident that happened when an individual or organisation was on school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). Hilltop Primary Academy will follow their safeguarding policies and procedures, including informing the LADO as they would with any safeguarding allegation.

Security

- Hilltop Primary Academy has a responsibility to provide a secure site that is controlled by clear management directives, but the site is only as secure as the people who use it. Therefore, all staff and people on the site have a responsibility for maintaining awareness of buildings and



grounds security and for reporting concerns that may come to light.

- Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a school lanyard/ visitor's pass. Our school has a clear system of ensuring visitors are accompanied/supervised by a staff member. If an enhanced DBS has not been seen, the visitor will be given a red lanyard and must be accompanied by a member of school staff at all times.
- Hilltop Primary Academy will not tolerate or accept the behaviour of any individual (including parents) that threatens school security or leads others (child or adult) to feel unsafe. This type of behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.
- Any individual on site who is not known, or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

Monitoring and Review

- All school staff (including temporary/supply staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/guardians on the school website or on request from the office.
- This policy has been written in (September 2024) to reflect the updated guidance and legislation issued in relation to safeguarding children and promoting their welfare.
- All staff will have access to this policy and sign to the effect that they have read and understood its contents. The DSL will review the policy following any serious child protection concerns (including following learning identified from serious case reviews) or substantiated allegations against staff, to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.
- The policy forms part of our school development plan and will be reviewed annually.

Local Support

- All members of Staff at Hilltop Primary Academy are made aware of local support available.

If a child may be at risk of **imminent harm**, you should call **Children's Services First Response Team on 01634 334466** and/or the **Police on 999**

- **Contact details for The Medway Education Safeguarding Service**

Education Safeguarding Officer

- Kate Barry (**Non Working Day Wednesday**)
- 01634 331017



- kate.barry@medway.gov.uk

Education Safeguarding Officer

- Fiona Veitch (**Non Working Day Friday**)
- 01634 331464
- Fiona.veitch@medway.gov.uk

Safeguarding Service Manager

- Maisie Adkins
- 01634 331065
- maisie.adkins@medway.gov.uk

Education Lead in MASH – For MASH Related Enquiries only.

- Harriet O'Brien
- 01634 331025
- harriet.obrien@medway.gov.uk

Contact details for the LADO:

- Telephone: 01634 331065
- Further information and contact details found: [Advice and resources for professionals](#)

Children's Social Work Services

- First Response: 01634 334466 (Monday to Friday from 9am to 5pm)
- Out of Hours: 03000 419 191

Kent Police

- 101 (or 999 if there is an immediate risk of harm)

Medway Safeguarding Children Partnership (MSCP)

- mscp@medway.gov.uk
- 01634 336 329

National Support

Support for staff

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

Support for Pupils

- NSPCC: www.nspcc.org.uk



- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Kidscape: www.kidscape.org.uk

Support for adults

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



APPENDIX 1: Definitions of Forms of Abuse/Specific Safeguarding Issues

Definitions of Forms of Abuse

All school and college 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **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.
- Please click on the hyper link for further information, advice and guidance: [NSPCC Physical Abuse](#)
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Please click on the hyper link for further information, advice and guidance: [NSPCC Emotional Abuse](#)
- **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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Please click on the hyper link for further information, advice and guidance: [NSPCC Sexual Abuse](#)

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

Please click on the hyper link for further information, advice and guidance: [NSPCC Neglect](#)

Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex B: Keeping Children Safe in Education 2024

Mental Health

- The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#).

In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people’s emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Every mind matters <https://www.nhs.uk/oneyou/>

The department is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the [Link Programme](#). Training for senior mental health leads, will be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health



Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

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

Honour based Violence (FGM and Breast Ironing)

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- Information and resources <https://www.gov.uk/government/collections/female-genital-mutilation>
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- National FGM Centre <http://nationalfgmcentre.org.uk/fgm/>

Contextual Safeguarding, Child-on-Child abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Brook: www.brook.org.uk
- Victim Support: www.victimsupport.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- [Supporting practice in tackling child sexual abuse - CSA Centre](#)

Substance Misuse

- Drugs advice for Schools: [Gov.uk Drugs advice for schools](http://Gov.uk/Drugs%20advice%20for%20schools)
- Talk to Frank <https://www.talktofrank.com/>
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/



Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC/ Net Aware: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- LGFL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

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



APPENDIX 2: Related Safeguarding Policies

This policy is one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies as listed below: (to be read and followed alongside this document). All policies are available upon request.

- Behaviour management and use of physical intervention
- Code of Conduct/Behaviour policy
- Online Safety; Social media and Mobile technology
- Anti-Bullying
- Data protection and Information sharing
- Relationship and Sex Education (RSE)
- Intimate care
- Health and safety, including plans for school reopening
- Attendance
- Risk assessments (e.g. school trips, use of technology, school re-opening)
- First aid and accidents
- Managing allegations against staff
- Staff behaviour policy, including Acceptable Use of Technology Policies (AUP)
- Safer recruitment
- Whistleblowing

APPENDIX 3: Procedure for dealing with disclosures (the 6 R's – what to do if)

1. Receive:

- Listen to what is being said without displaying shock or disbelief you display denial to a child or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

2. Reassure:

- Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now".
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk and reassure them they have done the right thing.

3. React:

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she....?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell explain describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you must talk to

4. Record:

- Make some very brief notes at the time and write them up in detail as soon as possible.
- Do not destroy your original notes
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used by the child
- Record statements and observable things, not your interpretations or assumptions – keep it factual.

5. Remember:

- Contact the designated member of staff
- The designated teacher may be required to make appropriate records available to other agencies

6. Relax

- Get some support for yourself



Equality Impact Assessment

Who is the policy or process intended for?	Pupils	Employees	Govs/ Trustees	Volunteers	Visitors
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Status of the policy or process:	New policy or process			Existing policy or process	
	<input type="checkbox"/>			<input checked="" type="checkbox"/>	
Analysis					
Protected Characteristic	Impact analysis			Explanation of impact analysis	
	Positive	Neutral	Negative		
Age:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Disability:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sex:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Gender reassignment:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Race:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Religion or belief:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sexual orientation:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Marriage or civil partnership:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pregnancy and maternity:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pupil groups (PP/SEN/CLA):	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Evaluation and decision making					
Summary of action taken:					
Final decision:					