



HILLTOP
PRIMARY SCHOOL

Safeguarding & Child Protection Policy

Key Document Details:			
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A **Beyond** ACADEMY
SCHOOLS TRUST



Beyond Schools Trust have reviewed, adapted and recommend this revised model Medway Safeguarding Policy for its Medway Schools for personalisation and adaptation.

Hilltop Primary School: Safeguarding & Child Protection Policy for Schools and Colleges 2026-27

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and can demonstrate they have read and understood their safeguarding responsibilities.



Key Contacts

	<u>Name</u>	<u>Contact information e.g. Email/Phone number</u>
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Safeguarding Governor	Anesa Onyebuchi	onyea069@hilltopprimary.co.uk
Other key staff	Andrew Minchin	Aminchin@beyondschools.co.uk
Local Safeguarding Partners		
First Response & SPA	For urgent child protection concerns	01634 334466 (Monday to Friday from 9am to 5pm)
First Response/ Family Help	To request non-urgent support	Multi-Agency Contact & Referral Form
Out of Hours – Emergency Duty Team	For urgent child protection concerns	03000 419 191
Kent Police	Emergency situations	999 for urgent matters
Local Authority Designated Officer	Allegations against adults in school	01634 331065 LADO referral
Education Safeguarding Service	Advice/Training/ Reviews	01634 331464 or 01634 331017 educsafeguarding@medway.gov.uk
Medway Safeguarding Children Partnership (MSCP)	Links to key Medway safeguarding policies, documents and training.	01634 336 329 mscp@medway.gov.uk
National Contacts		
NSPCC Whistleblowing Helpline	Free advice and support to professionals about how CP issues are being handled in their own or other organisation.	0800 028 0285 help@nspcc.org.uk



1. What to do if you have a worry about a child

Why are you concerned?

For example:

- A child shares a concern or worry or makes a comment that causes concern
- Changes to appearance, behaviour, emotional well-being or attendance
- Frequent or unexplained injuries/marks/bruises
- Witnessed or reported concerning, harmful or inappropriate behaviour, including online
- Worries about family circumstances, peer/sibling relationships or wider community context

Immediately record your concerns

Follow the school's procedure using CPOMS.

- Reassure the child, listen carefully and do not promise confidentiality
- Clarify concerns if necessary using open questions (e.g. **TED**: Tell, Explain, Describe)
- Use child's own words, record facts not opinions, if recording on paper, sign and date your record and report to DSL
- Seek support for yourself, if required from DSL

Inform the Designated Safeguarding Lead (David Petty or Rachel Harris)

Designated Safeguarding Lead

- Consider whether the child has suffered, or is at immediate risk of, harm e.g. unsafe to go home
- If the child **is at imminent risk of harm**, make a telephone contact to First Response – 01634 334466 (out of working hours contact Out of Hours on 03000 41 91 91) and/or call 999.
- If your concern is high, but the child is **NOT** at imminent risk, or for Family Solutions referrals use the [portal](#)
- For early help, consider if internal support or referral to other agencies is appropriate
- Use the MSCP [Right Support at the Right Time \(Threshold\) Guidance](#) .

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, and why.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Who is responsible
- Where, how and to whom you will feedback and how you will record

At all stages the child's situation will be kept under review (if necessary)

The DSL/Staff will request further support if required to ensure the child's safety is paramount

If you are unhappy with the response

DSL/Staff:

- Follow Whistleblowing procedures
- [Link to school policy]
- Follow [MSCP escalation procedures](#)

Pupils/Students and Parents:

- Follow school complaints procedures
[Click here](#)

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2. Introduction and ethos

Procedures in this policy apply to all staff, including temporary or agency staff, students on placement, governors and volunteers and are consistent with Keeping Children Safe in Education 2026

- Hilltop Primary School recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors/proprietors, leaders, parents, family networks, 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 School has a child focused approach to safeguarding and is committed to providing a culture in which children are safe, feel safe, are respected, and are encouraged to speak openly about their worries and concerns.
- Our staff maintain an attitude of "it could happen here" and act promptly in the best interests of the child, whenever concerns arise. Any member of the school community with a safeguarding concern about a child or adult is expected to take immediate action in accordance with this policy.
- All children (defined as those up to the age of 18) regardless of age, sex, ability, culture, race, language, religion, or sexual identity, have equal rights to being protected, supported and heard, and to have their wishes and feelings taken into account. This includes those living with birth parents, children in kinship care, adopted children, looked after children, previously looked after children and care leavers. Where safeguarding concerns relate to pregnancy, staff will also consider the help, support and protection needs of unborn children.

Hilltop Primary School is committed to promoting equity, inclusion, dignity and respect. We recognise that unconscious bias may affect perceptions and decision-making and therefore seek to educate and challenge all members of the school community, to ensure that safeguarding practice is fair, inclusive and responsive to the needs of all children.

- Staff will challenge all forms of discriminatory, derogatory or sexualised language and behaviour, including racism, sexism, homophobic, biphobic and transphobic abuse, bullying (including cyberbullying), upskirting and inappropriate physical conduct. Such incidents will be addressed promptly, recorded appropriately and managed in line with statutory requirements.
- We recognise that some children, including girls, pupils who are or may be perceived to be lesbian, gay, bisexual or gender questioning, and pupils with SEND, may be at increased risk of peer-on-peer abuse and other harmful behaviours. Appropriate and accessible opportunities will be provided to enable them to raise concerns and access support. Pupils will be taught and supported to develop an understanding of respect, inclusion, equality and positive relationships.
- Staff understand their responsibilities under the Equality Act 2010, the Public Sector Equality Duty, the Human Rights Act 1998 and related legislation, and recognise the importance of these duties in safeguarding practice.



- This policy applies where there are any safeguarding, child protection or welfare concerns about children who attend the Hilltop Primary School, and, where relevant, may also apply to other children connected to the school, such as siblings, children on student/work placements or young members of staff (under 18).
- Through their day-to-day contact with pupils and families, all staff and volunteers have a crucial role to play in identifying and responding to indicators of possible abuse, neglect and/or exploitation at the earliest opportunity. For some children, the school may be their primary source of stability, security and support.
- Hilltop Primary School recognises that children's behaviour, presentation and experiences should be understood in context. Staff take a trauma-informed approach to safeguarding, considering the root causes, and traumatic impact of abuse, neglect, exploitation, discrimination and contextual harm on children's presenting behaviour.
- Hilltop Primary School supports the welfare and safety of all pupils by:
 - placing the child's welfare at the centre of all decision making;
 - ensuring all staff are trained to recognise the signs and symptoms of abuse and know and understand the school's procedures and reporting routes;
 - supporting children's physical, mental and emotional health, wellbeing and development;
 - providing children, a broad curriculum including PSHE (Personal, Social and Health Education); RSHE (Relationships Sex and Health Education) to help pupils understand risk, know what safety feels like, build healthy relationships and know where and how to seek help;
 - working in partnership with parents/carers 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 when required;
 - maintaining accurate, secure and confidential safeguarding records;
 - ensuring the child's lived experience, voice and views inform safeguarding practice and decision making.
 - Implementing robust safer recruitment procedures for staff, trainee teachers, volunteers, contractors and visitors;
 - Promoting clear expectations of behaviour across the entire school community.
- This policy is implemented in accordance with the Department for Education's statutory guidance, *Keeping Children Safe in Education* (KCSIE) 2026, which places a duty on schools and colleges to maintain effective child protection policies and safeguarding arrangements.
- The procedures contained in this policy apply to all adults working on behalf of the school, including governors, temporary or third-party agency staff, trainee teachers and volunteers

3. Policy Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
 - DfE Keeping Children Safe in Education (KCSIE) 2026
 - Working Together to Safeguard Children (WTSC) 2026
 - Ofsted: Education Inspection Framework 2026
 - Framework for the Assessment of Children in Need and their Families 2000)
 - [Kent and Medway Safeguarding Children Procedures](#)
 - Early Years Foundation Stage Framework (EYFS) 2026
 - The Education Act 2002
- [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 or students 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.

4. Definition of Safeguarding

- Safeguarding children is defined in Working Together to Safeguard Children 2026 and Keeping Children Safe in Education 2026 as:
 - providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - preventing impairment of children's mental and physical health or development
 - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
 - promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
 - taking action to enable all children to have the best outcomes
- Child Protection – is a part of safeguarding and promoting the welfare of children. It is defined as activity undertaken to protect children who are believed to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. Significant harm is the threshold used to determine when statutory child protection intervention may be required. Under the Children Act 1989, "Harm" is the "ill treatment or the impairment of the health or development of the child". Harm can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child". There are no absolute criteria for determining significant harm. Significant harm may arise from a single serious incident or from a pattern of acute, longstanding, chronic or cumulative concerns which impair a child's health or development.
- Hilltop Primary School recognises that safeguarding concerns are rarely isolated. Children may experience multiple and overlapping harms, including abuse, neglect, exploitation, online harms and extra-familial harm. Our safeguarding response will consider the full context of a child's lived experience, including their relationships, family circumstances, peer groups, community, online activity and wider environment.
- Hilltop Primary School acknowledges that safeguarding includes a wide range of issues and risks, including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Child abduction
 - Children with family members in prison or affected by parental offending
 - Children Missing Education (CME), missing from home or care
 - Children in the court system, including children affected by parental separation, court orders or family disputes
 - Contextual safeguarding (risks outside the family home)
 - Exploitation, including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines, gangs, serious violence, trafficking and modern slavery

- Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate, discrimination and harmful prejudice
 - Homelessness
 - Mental health
 - Online and technology-assisted abuse, including making or sharing nudes or semi-nudes
 - Child-on-child abuse (including harassment and violence)
 - Radicalisation and extremism
 - Private fostering
 - Sexual violence, sexual harassment, harmful sexual behaviour and relationship abuse
 - Honour and faith-based abuse, including Female Genital Mutilation (FGM) and forced marriage
- (Also see Part One and Annex A within 'Keeping Children Safe in Education' 2026)

5. Key Responsibilities

5.1 Governance and Leadership Responsibilities

- The Trust Board retains ultimate strategic accountability for safeguarding across the Trust. Together with the Chief Executive Officer and executive leadership team, it ensures that the Trust complies with its safeguarding duties under legislation and statutory guidance. Safeguarding responsibilities may be delegated, but the Trust Board's accountability cannot be delegated. This reflects the Trust Safeguarding Framework & Scheme of Delegation 2026.
- The Trust Board, Local Governing Body, Chief Executive Officer, executive leadership team and school leadership team fulfil their respective safeguarding responsibilities in accordance with the Trust Safeguarding Framework and Scheme of Delegation. They ensure that appropriate policies, procedures and systems are in place so that timely and proportionate action is taken to safeguard and promote children's welfare.
- The Trust Board has regard to Keeping Children Safe in Education and ensures that Trust safeguarding policies, procedures, training and assurance arrangements are effective and comply with the law. All schools operate within the Trust's safeguarding policy suite, including the appropriate Kent or Medway policy. Local procedures must meet the standards established through the Trust Safeguarding Framework. Any local variation must be explicit, professionally justified and recorded, and must not dilute the Trust's safeguarding non-negotiables.
- The Trust Board ensures that all Trustees receive safeguarding and child protection training, including online safety, appropriate to their role at induction and that this training is regularly updated. The Local Governing Body ensures that its governors receive equivalent training appropriate to their delegated safeguarding assurance responsibilities. This training equips Trustees and governors to provide effective challenge and to assure themselves that safeguarding policies, procedures and practice support a robust whole-school and Trust-wide approach to safeguarding.
- The Local Governing Body provides school-level safeguarding assurance on behalf of the Trust Board. It monitors the lived experience of safeguarding for pupils, staff and families; tests the effectiveness of local safeguarding culture and practice; challenges unjustified divergence from Trust expectations; and escalates concerns, risks or patterns of weakness that cannot be resolved within the school. The Local Governing Body provides evidence-based assurance and challenge but does not become involved in the operational management of individual safeguarding cases.
- Anesa Onyebuchi is the Local Governing Body's Safeguarding Link Governor. On behalf of the Local Governing Body, they take the lead in scrutinising whether:
 - the school's safeguarding arrangements are effective;
 - Trust and locally agreed procedures are understood and followed;
 - safeguarding and related policies operate coherently;
 - safeguarding policies are reviewed at least annually and whenever required; and
 - identified concerns and agreed actions are appropriately followed up or escalated.

The Safeguarding Link Governor provides oversight, scrutiny and challenge but does not assume the operational responsibilities of the Headteacher, DSL or safeguarding team.



- The Trust Board and Local Governing Body promote a whole-school and Trust-wide approach to safeguarding. They ensure that safeguarding and child protection are at the forefront of relevant policy and process development and that systems, decisions and practices operate with the best interests of the child at their centre. Safeguarding assurance considers culture and the lived experience of pupils, staff and families, rather than relying solely on policy compliance or written records.
- The Trust Executive, through the Directors of Education, oversees the coherence and quality of safeguarding arrangements across the Trust. Executive leaders consider safeguarding intelligence from schools, provide thematic assurance to the Trust Board and intervene where patterns of weakness, inconsistency, capacity pressure or systemic risk emerge. This may include targeted support, additional supervision, guidance or direct executive oversight.
- The Trust Board receives strategic assurance about the effectiveness of filtering and monitoring arrangements across the Trust, while the Local Governing Body scrutinises their effectiveness within the school. The Local Governing Body assures itself that the school leadership team and relevant staff understand their responsibilities for managing, monitoring and reviewing the systems and for escalating identified concerns. The DSL's operational responsibilities for online safety, filtering and monitoring are set out in section 5.2.
- The Headteacher ensures that an appropriate senior member of the leadership team is appointed as the Designated Safeguarding Lead (DSL) and that sufficient Deputy Designated Safeguarding Lead capacity is maintained. The Headteacher, supported by the Trust, ensures that the DSL and deputy DSLs have the appropriate status, authority, time, funding, resources, training and support to carry out their responsibilities effectively. The detailed responsibilities of the DSL and deputy DSLs are set out in section 5.2 of this policy
- The Local Governing Body assures itself that safeguarding leadership within the school is appropriately structured, resourced and effective. Any concerns about safeguarding leadership capacity, systemic risk, persistent weaknesses or unresolved divergence from Trust expectations are escalated through the Trust's agreed safeguarding arrangements.

5.2 Designated Safeguarding Lead (DSL) Responsibilities

- The school has appointed David Petty as the Designated Safeguarding Lead (DSL). They are 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, including online safety, filtering and monitoring and processes in place.
- We have appointed Rachel Harris (FLO), Andy Hart (Deputy Head), Madeleine Wise, Caroline Wooder (Assistant Heads) and Katie Osmond (SENCo) as Deputy DSLs (DDSLs), who have delegated responsibilities and act in the DSL's absence.
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL carries out their role as identified in Appendix B of Keeping Children Safe in Education 2026, these duties are set out in their job description.

- The Designated Safeguarding Lead undergoes appropriate training to provide them with the knowledge and skills required to carry out their role. DDSLs are trained to the same standard as the DSL. Accredited DSL training, specific to the role, is renewed every two years. Knowledge and skills are updated at regular intervals, at least annually, according to the needs of the school
- The headteacher is kept informed of any significant issues by the DDSLs.
- Availability - during term time the DSL (or a DDSL) is always available (during school hours) for school staff to discuss any safeguarding concerns. Adequate and appropriate cover arrangements are made for any closures, off-site activities and any out of hours/out of term activities

Emails of all staff on the safeguarding team are sent to the MASH education lead at Medway.

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. Schools should ensure that safeguarding responsibility during holiday periods is shared across the safeguarding team and does not rely on one individual alone.

The Designated Safeguarding Lead (DSL) is responsible for fulfilling the duties outlined in Annex B of KCSIE. These responsibilities include, but are not limited to:

- Act as main contact point for all school staff to discuss any safeguarding concerns.
- Manage and maintain the confidential electronic case management systems that record concerns about pupils/students, to ensure the quality of information is accurate, proportionate, and timely and that referrals are made appropriately.
- Coordinate safeguarding action for individual children, including children who need a social worker, children receiving early help support, those who are looked after, in kinship care, or previously looked after and those subject to child protection or child-in-need plans. In the case of Children in Care, the DSL will 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 to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- 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 2026 and WTTSC 2026.
- Ensure that locally established procedures are followed as necessary, including [MSCP referral procedures](#)
- Support educational outcomes by effectively sharing information about welfare, safeguarding, and child protection concerns—including those affecting children with a social worker—with teachers and the school leadership team
- As required, represent and liaise appropriately with other professionals and ensure the school is represented at multi-agency safeguarding meetings (including child protection conferences).
- Take lead responsibility for online safety, including understanding filtering and monitoring systems and processes
- 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, including online safety, and relevant updates in line with the recommendations within Keeping Children Safe in Education 2026.

5.3 Responsibilities of Members of Staff

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

Staff are well-placed to notice changes in a child's behaviour, appearance, attendance or well-being, identify concerns early and to take action to prevent concerns from escalating

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.
- Be alert to any issues of concern in a child's life, at home, or elsewhere, including the online world.
- Be aware of the indicators of abuse, neglect and exploitation, so they can identify cases of children who may need help or protection.
- Understand the early help processes available to support children before statutory intervention, including universal services, community-based early help and targeted Family Help.
- Understand the local processes for seeking advice and making referrals to Medway children's social care.
- Understand that children may not feel ready, 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.
- Build trusting relationships that facilitate communication with pupils and parents/carers, to support communication and early identification of needs and concerns.
- Know what to do if a child tells them that he or she is being abused, neglected or exploited, including reassuring them that they are being taken seriously and that they will be supported and kept safe.
- Know how to maintain an appropriate level of confidentiality, whilst understanding the importance of early sharing of information to keep children safe.
- Understand and comply with this policy and understand related safeguarding policies and systems.



- Staff help improve and enhance the safeguarding policy through their contributions and development.
- To undertake and engage with regular and appropriate safeguarding training and updates, including online safety.
- 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)
- Act in line with our staff code of conduct
- Where applicable, act in line with the [Teachers' Standards](#) which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

5.4 Children and Young People

Children have a right to:

- Report abuse confidently, knowing concerns will be taken seriously and that they will be listened to, and that 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.
- Contribute to the development of school safeguarding policies e.g. by putting pupil voice at the centre of our practice.

5.5 Responsibilities of Parents and Carers

- Work in partnership with the school to safeguard and promote the welfare of child/ren and understand Hilltop's statutory responsibilities in this area.
- Read and adhere to the relevant school/policies and procedures.
- Talk to their children about safeguarding issues, including online safety, and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm, including online
- Follow the school's published procedure for logging complaints to address issues/concerns and guarantee Hilltop's prompt response.
- Seek help and support from the school, or other appropriate agencies if they have concerns about their child, or another child's well-being.

6. Child Protection and Safeguarding Procedures

Recognising Indicators of Abuse, Neglect and Exploitation

- 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 many cases, multiple issues will overlap with one another. This is outlined locally within the [MSCP Right Support at the Right Time \(Threshold\) 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 are made aware of the definitions and indicators of abuse, neglect and exploitation as identified in KCSIE. Staff are expected to understand these indicators in line with [MSCP Guidance](#).
- There are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect

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

- Indicators of abuse, neglect and exploitation do not automatically mean a child is being abused, however all concerns should be taken seriously, reported and explored by the DSL, on a case-by-case basis.
- The warning signs and symptoms of child abuse, neglect and exploitation will 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 School 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 DSL (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.

6.1 Responding to Safeguarding and Child Protection Concerns

- Where safeguarding concerns are identified, the child's lived experience, voice and views will remain central to our decision-making, assessment and planning.
- Children are supported to express their views and give feedback through established systems and processes including 'words and pictures', 'three houses' and with the aid of 'dual-coding' for pupils with speech and language difficulties. While all decisions are guided by the best interests of the child, this must not prevent safeguarding action being taken when necessary to protect the child or children involved.
- Hilltop Primary School adheres to the [Kent and Medway Safeguarding Children Procedures](#), where additional guidance relating to specific safeguarding issues can also be found.
- If a member of staff has a concern about a child's welfare, they must act immediately. See page X for the flow chart setting out the concern-reporting process.
- Once staff have reported their concerns, the DSL will decide what action to take, this may include
 - continuing to closely monitor the situation, providing there is clarity about what is being monitored, by whom and when this will be reviewed
 - managing any support for the child internally, via the school's own pastoral support processes, where this is appropriate and does not place the child at additional risk.
 - Accessing universal services and community-based early help for children with *emerging needs*
 - a referral for a Family Help Assessment
 - a referral to Children's Services for statutory intervention.
- If a child is in imminent danger or at immediate risk of harm, any member of staff can make an external report, either by telephone to First Response 01634 334466 and/or the police. If it is an emergency the police need to be called on 999.
- When there are child protection concerns, the role of the school is NOT to investigate but to recognise and refer.
- The DSL will usually have responsibility for making referrals. However, all staff know how to make a referral to children's services and have an awareness of what may happen once they have done this.
- In most cases, 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 this 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 another member of the DSL team who can be identified on the school's safeguarding poster. They may also seek advice for non-urgent worries ONLY from Family Solutions Early Help co-ordinators.

Family Solutions / Early Help (Medway)

Telephone: 01634 334466

Email: <mailto:ehltt@medway.gov.uk>

- 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 concerned about what action has been 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, universal and community based early help and Family Help support services. Where a child is being offered or receiving community base early help or Family Help support, relevant 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 community based 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 School understands that Operation Encompass notifications, received from the police, do not replace statutory safeguarding procedures. If a notification adds to concerns about a child's welfare, the DSL will consider whether a contact needs to be made to Medway children's services.

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

6.2 Working with parents/carers and families

- We are committed to working with parents/carers positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents'/carers' rights to privacy and confidentiality, and will not share sensitive information, unless we have permission, or it is necessary to do so to protect a child/children from harm.
- The school will work collaboratively with parents and carers to promote the welfare of children. This includes proactively engaging fathers and male carers, where appropriate, and recognising their potential contribution to safeguarding and promoting children's welfare. Effective father engagement supports a better understanding of children's lived experiences and family circumstances. Examples of parent engagement include workshops, wow events and assemblies that parents can get involved with. Parents and carers are a valuable part of the Hilltop school community.

6.3. Record Keeping

Safeguarding and child protection 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.

- Well-kept records are essential to good safeguarding and 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 safeguarding and child protection records contain a clear and detailed summary of any concerns raised, including how they were followed up and resolved. Records will also note any actions taken (or not taken), the rationale behind decisions made, and the outcomes.
- 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 will usually record facts and not personal opinions. If a staff member records an opinion, they should make this explicit in the recording.
- A body map will be completed if injuries or marks are observed, with an accompanying detailed and objective written description.
- Staff should NOT take photographs of injuries; staff should use body maps and written descriptions 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, in exceptional circumstances, photos of injuries are required for evidence purposes, this should be carried out by specialist police officers.

CPOMS is used by all staff. Recording a concern is covered in annual safeguarding training and induction for new starters. Visitors to the school are asked to report any concerns to a member of the safeguarding team who can record the incident electronically with them.



Hilltop Primary School recognises the need for clarity and quality in safeguarding recording to ensure children have the right support at the right time.

6.4 Transferring and receiving safeguarding and child protection files

- When a child leaves Hilltop the DSL will ensure their safeguarding and 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 will be done separately from the main pupil file, in accordance with data protection legislation, ensuring secure transit. Confirmation of receipt will be obtained.
- Prior to pass files on, the DSL will review them, ensuring only safeguarding and child protection information is transferred. Where necessary for data protection (i.e. the names of other pupils/students) there will be necessary redaction.
- 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.
- Safeguarding and child protection files are kept by the education setting where the child is on roll. Transferring settings do not need to keep copies of child protection files, but if there is reason to, such as impending court proceedings, they will be kept in accordance with Hilltop Primary School's data retention policy. In cases where there may be ongoing involvement from our school, for example if any siblings still attend our setting, our DSLs may keep copies of chronologies etc.in accordance with our data retention policy.
- When Hilltop Primary School receives safeguarding and child protection files the DSL will read, review and alert necessary staff if further actions or monitoring are needed to take place.
- If a child joins Hilltop Primary School and no child protection file is received, the DSL will proactively contact the previous setting to confirm whether a file exists and, if so, ensure it is transferred securely without delay.
- Where information shared during transition indicates that a child may present a risk to others and/or may be at risk themselves, we will consider what safeguarding action is required before, or as soon as possible after, the child starts. This may include completing or reviewing a safeguarding risk assessment and putting in place an appropriate safety and support plan.

6.5 Multi-agency Working

- Hilltop Primary School identifies that we have a pivotal role in multi-agency safeguarding arrangements. The leadership team, DSL and governing body are committed to, and ensure that the school or college contributes to multi-agency working, in line with statutory guidance Working Together to Safeguard Children 2026 and local MSCP procedures. We work to establish strong and co-operative relationships with professionals from other agencies. Examples of multi-agency partnerships may include professionals such as social workers, early help practitioners, health professionals (including paediatricians, health visitors, mental health services, and speech and language therapists), specialist teachers, educational psychologists, staff from other schools or settings attended by the child, and the police.
- Hilltop Primary School 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.
- Where a child is supported through community-based early help, Family Help, Child in Need, Child Protection or care planning processes, the school will work with partner agencies to promote joined-up planning, avoid unnecessary duplication and ensure the child's educational needs, safety, voice and lived experience are considered. We will provide requested reports within timescales and attend relevant safeguarding meetings, including child protection conferences, core groups, strategy meetings, Child in Need meetings or early help multi-agency meetings.

6.6 Confidentiality and Information Sharing

- Hilltop Primary School recognises our duty to hold, use and share relevant information with appropriate agencies in matters relating to safeguarding and promoting the welfare of children. Information will be shared at the earliest opportunity when it is needed to identify, assess or respond to risk, as per statutory guidance outlined within KCSIE 2026 and other relevant legislation.
- Hilltop Primary School expects all staff to treat information they receive about children and young people in a highly discreet and confidential manner. Confidential information should never be discussed casually in conversation or shared with any person other than on a 'need-to-know basis.'
- All members of staff must be aware that whilst they have duties to keep information confidential, they also have a professional responsibility to be proactive and share information as early as possible, to help identify, assess and respond to risks or concerns about safety, welfare and well-being. This will only involve those who need to be involved, such as the DSL, Medway Children's Services or the police.
- KCSIE, the [Information Commissioner's Office](#) (ICO), DfE [Data Protection in schools guidance](#) and DfE '[Information sharing advice for safeguarding practitioners](#)' guidance provide further details regarding the information sharing principles and expectations we adhere to.
- Data protection laws do not prevent the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Information

sharing decisions will be informed by safeguarding need, risk assessment, proportionality, data protection requirements and the need to promote the welfare and safety of the child and others.

- Staff at Hilltop receive appropriate guidance about information sharing and data protection through regular staff training including online training modules.
- Hilltop Primary School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school/college is compliant with all matters relating to confidentiality and information sharing requirements.

DPO Officer: Craig Stilwell

Company: Judicium Consulting Ltd

Email: <mailto:dataservices@judicium.com>

Telephone: 0203 326 9174

- All staff are aware that they cannot promise confidentiality to a child, because this might compromise the child's safety or wellbeing. All concerns must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

7. Specific Safeguarding Issues

- Staff at Hilltop Primary School are aware that children may be vulnerable to a wide range of safeguarding issues, both inside and outside of the home, and online.
- All staff at Hilltop Primary School have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as mental health difficulties, substance misuse, unexplained absences from education, and sharing nudes or semi-nude images 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.
- Further information about specific safeguarding issues is available in Keeping Children Safe in Education.

7.1 Child-on-Child Abuse (including harassment and violence)

- Hilltop Primary School recognises that children can abuse other children and that it can happen both inside and outside of school and online. This is referred to as child-on-child abuse and can take many forms.
- Hilltop Primary School is committed to challenging inappropriate behaviours between children that are abusive in nature. Staff understand that abuse is abuse, and it will never be tolerated, or passed off as “banter”, “just having a laugh” or “part of growing up”. This can lead to a culture of unacceptable behaviours, misogyny/misandry, and can create an unsafe environment and a culture that normalises abuse, meaning children are inhibited from reporting it. All concerns and reports will be taken seriously and all children affected will be offered appropriate support, regardless of where the behaviour has occurred.
- Hilltop Primary School recognises that child-on-child abuse can take many forms, including but not limited to:
 - bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between children, sometimes known as ‘teenage relationship’ abuse.
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, including where there is an online element that threatens and/or encourages physical abuse
 - serious physical assault and harm, or the threat of harm, with a weapon
 - sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
 - sexual harassment, such as sexual comments, remarks, jokes and sexualised harassment online: this may stand alone or be part of a broader pattern of abuse. and sexualised harassment
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- ‘up-skirting’, which 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
 - Consensual and non-consensual making or sharing of nude or semi-nude imagery
 - initiation/hazing type violence and rituals – this could include activities involving harassment, abuse or humiliation and may also include an online element
- Hilltop Primary School recognises that harmful sexual behaviour exists on a continuum, from developmentally inappropriate or problematic sexual behaviour through to abusive behaviour and sexual violence.
 - 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.

Prevention

- To minimise the risk of child-on-child abuse, Hilltop Primary School ensures that appropriate curriculum time is dedicated to enabling children to develop an awareness and understanding of abusive behaviour and to minimise the risk of all forms of child-on-child abuse. We also ensure that children recognise warning signs and the support that is available, both within the school and externally (such as Kent Police, ChildLine etc.).

Responding to concerns

- Hilltop Primary School will not tolerate, dismiss or minimise any harmful behaviours between pupils, whether in school, off-site or online, 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 policies, including child protection, anti-bullying and behaviour.
- Where possible, KCSIE 2026 recommends that two members of staff manage reports of harmful sexual behaviour, sexual violence and harassment. immediate consideration will be given to the safety and wellbeing of all children involved;
- the DSL will undertake and record a risk and needs assessment, which will be kept under review;
- reports will be managed internally and where appropriate referred to Children’s Social Care and/or the Police when required;
- decision-making and required action will vary on a case-by-case basis, but will consider the wishes of the victim, the nature and seriousness of the incident, the ages and developmental stages of those involved, any power imbalance, ongoing risks and the wider context;
- the school will consider the physical and mental health needs of both the victim and the alleged perpetrator and provide or arrange appropriate support;
- the school will regularly review actions and learning arising from incidents to strengthen safeguarding practice.

- Staff will remain vigilant to signs of abuse, including verbal disclosures, observed behaviours and changes in presentation. Concerns arising online or outside school will be treated with the same seriousness as those occurring within school.
- Victims will always be reassured that they are being taken seriously, supported and kept safe. No child will be made to feel ashamed of, or responsible for, the abuse they have experienced, or discouraged from reporting concerns.
- Alleged victims, perpetrators and any other child affected by any form of child-on-child abuse require support, this may be through appropriate pastoral, educational and safeguarding interventions or referral to external agencies:

7.2 Making or sharing nude and/or semi-nude images

- DSLs will respond to concerns as set out in the UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Updated March 2024) and [Kent and Medway responding to nude and semi-nude image sharing: guidance for professionals](#)
- The term 'sharing nudes and/or 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. This includes imagery created/created by a child, digitally altered, or generated using AI. Sharing may take place online, between devices, via social media or messaging apps, gaming platforms, forums, livestreams or other digital routes. Creating, possessing or sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. However, Hilltop recognises that the law is in place to protect children rather than unnecessarily criminalise them. Responses will therefore be in line with the documents referenced at the beginning of this section and be child-centred, proportionate and focused on safeguarding and supporting the children involved.
- When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff must:
 - Report the concerns to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (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 School recognises that the making or sharing of nudes or semi-nudes is a safeguarding issue; this also includes AI produced sexual imagery. 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's Services.

7.3 Exploitation, including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), County Lines, Serious Violence and Modern Slavery

- Hilltop Primary School recognises CSE, CCE, county lines, serious violence and modern slavery are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate, deceive or force a child into sexual or criminal activity. There is often overlap between these safeguarding issues. Children may experience exploitation alongside other forms of abuse, neglect or harm. The school will therefore need to consider the full context of the child's lived experience, including risks outside the home, peer groups, community locations, transport routes and online environments.
- Hilltop Primary School recognises that children become trapped in exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they may not be treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity *appears* to be something they have agreed or consented to.
- Hilltop Primary School recognises that exploitation may be committed or facilitated by individuals, organised networks or gangs, and the child may identify as being part of the group that is exploiting them. Exploitation can affect children of any age and sex, and it is not possible for a child to consent to being exploited, abused or trafficked.

- Hilltop Primary School recognises that:
 - Child Sexual Exploitation (CSE) can occur over time, or be a one-off occurrence, and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE may range from a one-off opportunistic incident to complex organised abuse. It can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
 - Child criminal exploitation (CCE) may include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, vehicle crime, threatening or committing serious violence, or carrying weapons. Children can become trapped in criminal exploitation through threats, violence, intimidation, debt bondage, grooming or coercion, including threats towards their families. The experience of girls who are criminally exploited can be different from that of boys, and indicators may not be the same. Girls are also at risk of criminal exploitation. Both boys and girls who are criminally exploited may be at higher risk of sexual exploitation.
 - County lines is a form of criminal exploitation involving gangs or organised criminal networks using dedicated mobile phone lines or other forms of "deal line" to export illegal drugs. Children may be exploited to move, store or sell drugs or money and may be controlled through coercion, intimidation, violence, threats, debt bondage, online activity or exploitation of their family circumstances.
 - Serious violence includes violence and exploitation involving weapons, gangs, criminal networks or serious physical harm. It can involve carrying, threatening with, or using knives or other weapons, or concerns that a child may be exposed to weapons through peers, gangs, criminal networks or community-based harm. The likelihood of involvement in serious violence may be increased by factors such as being male, having been suspended, spent time in alternative provision or been permanently excluded, having experienced child maltreatment, having been involved in offending, having used drugs or alcohol in early adolescence, or having previously been a victim or displayed violence. Serious violence can often peak in the hours just before or after school/college, including when children are travelling to and from the setting, and may be concentrated in particular places.
 - Modern slavery includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, criminal exploitation, forced criminality, forced labour, domestic servitude and the removal of organs.
- Staff will be aware of the indicators that a child may be at risk of, or experiencing exploitation, county lines or serious violence. These may include:
 - increased absence from school or college,
 - regular missing incidents from home or care
 - a change in friendships or relationships with older individuals or groups,
 - a significant decline in educational performance,
 - changes in wellbeing, signs of self-harm or assault or unexplained injuries.
 - unexplained gifts, money or new possessions

- Exploitation can be difficult to spot. Knowing the signs can help protect children and help them when they have no one else to turn to. To support in identifying the signs of child sexual exploitation we will refer to the [Kent and Medway Exploitation Identification Tool](#)
- If staff are concerned that a child may be at risk of any form of exploitation, immediate action will be taken by reporting concerns to the DSL.
- Hilltop Primary School 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.
- Where broader intelligence is known about potential exploitation or other community safety issues, the DSL will share information with Kent Police via the [Community Partnership Intelligence Portal](#)
- Where modern slavery or trafficking is suspected, relevant procedures will be followed for the individual and the DSL will consider if a referral through the [National Referral Mechanism is required](#).

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

7.4 Domestic Abuse

- Hilltop Primary School recognises that domestic abuse can encompass, but is not limited to, psychological; physical; sexual; financial and/or emotional abuse, including coercive and controlling behaviours. It occurs when there is an imbalance of power within a relationship. Domestic abuse may be a single event, or a pattern of incidents. Domestic abuse may take place inside, or outside the home. It can occur within different types of relationship, including intimate partner relationships, ex-partners, and family members. Domestic abuse can happen in teenage relationships and between a child to their parent/carer.
- Hilltop Primary School recognises that anyone can be a victim of domestic abuse, regardless of sex, age, ethnicity, socio-economic status, sexuality, background or identity.
- Hilltop Primary School recognises that domestic abuse may occur, continue or escalate following separation.
- Hilltop Primary School recognises that children are victims of domestic abuse if they see, hear or experience the effects of the abuse, or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). In some cases, a child may blame themselves for the abuse. We know that domestic abuse can have a detrimental and long-term impact on children's health, wellbeing, development and ability to learn.
- Hilltop Primary School participates in [Operation Encompass](#), the information sharing scheme between police and schools/colleges to provide timely and informed support to children experiencing domestic abuse. Police forces in England have a duty to inform a child's school (where possible, PRIOR to the start of the next school day) when they have attended a domestic abuse incident – this includes children connected to the household regardless of whether they were present at the incident.

- Operation Encompass notifications will help the [\[school/college\]](#) to have up-to-date and relevant information about a child's circumstances so that appropriate support can be considered according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures; where there are concerns about a child's welfare, the DSL will consider whether a contact needs to be made to First Response.
- Operation Encompass notifications are handled confidentially, in-line with our safeguarding recording procedures and data protection requirements. All staff know what Operation Encompass is, and there is a clear process for managing notifications in school including logging the concern on CPOMS, checking the pupil chronology for any recent concerns and asking the teaching team to monitor the pupil. Any remaining concerns are referred to relevant partners for consideration.
- Where the school is unsure of how to respond to a notification, advice may be sought from First Response. Operation Encompass operates an advice and helpline which is available from 8am to 1pm, Monday to Friday - 0204 513 9990.

7.5 Honour or Faith-Based Abuse (HBA)

- Hilltop Primary School recognises that honour or faith-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community. This can include female genital mutilation, 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. Staff will be alert to this dynamic and the additional risks it may create when deciding what safeguarding action is required
- 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.
- [Female Genital Mutilation](#) (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 personally 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. Those failing to report such cases may face disciplinary sanctions.

- It will be rare to see visual evidence of FGM, and staff must not examine [pupils/students]. Unless the teacher has good reason not to, they should also discuss the concern with the DSL. The mandatory reporting duty does not apply to suspected or at-risk cases where FGM has not been discovered; in these cases, staff must follow local safeguarding procedures and speak to the DSL.
- Forced marriage: Hilltop Primary School recognises that it is 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 other form of coercion are used. This also applies to non-binding, unofficial 'marriages'
- Staff must report any concerns relating to forced marriage immediately to the Designated Safeguarding Lead (DSL). Concerns should be managed in accordance with safeguarding procedures and, where appropriate, advice can be sought from the Forced Marriage Unit: Telephone: 020 7008 0151 Email: fmufcdo.gov.uk

7.6 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 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.
- Every two years, 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.
- Staff will be supported to use their judgement to identify children who might be at risk of radicalisation; they will report concerns to the DSL (or a deputy), who (where proportionate and appropriate) will follow the local procedures when making a Prevent referral.
- If there is an immediate threat to safety, the police will be contacted via 999.
- Where a child is receiving support regarding concerns relating to preventing radicalisation, for example, through the 'Channel' programme, the DSL will consider if it would be appropriate to share any information if/when a child leaves to attend any new schools/colleges, so support can be put in place in place for when the child arrives. Statutory guidance on Channel is available at: Channel guidance and Channel training from the Home Office.

8. Supporting Children Potentially at Greater Risk of Harm

Hilltop Primary School recognises that some children may be more vulnerable to abuse, neglect, exploitation or harm, or may face additional barriers to recognising, reporting or being supported with safeguarding concerns. Staff will be alert to the needs and experiences of these children and will ensure concerns are reported to the DSL, in line with this policy.

8.1 Children requiring support with their mental health

- Hilltop Primary School has an important role to play in supporting the mental health and well-being of our pupils. We recognise that difficulties with mental health may develop into safeguarding concerns, for example – self-harm, eating disorders, suicidal ideation. Behaviours associated with mental health problems may also indicate that a child is at risk of suffering abuse, neglect, harm or exploitation
- Where children have suffered abuse, neglect and exploitation, 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 diagnose a mental health problem. Staff, however, observe children day-to-day and are 'well placed' to identify behaviours that may indicate a mental health problem or a child who is at risk of developing one.
- Staff are alert to potential warning signs that a child may be struggling with their mental health (e.g. significant changes in behaviour, withdrawal, not wanting to do things they usually enjoy, physical signs of self-harm or self-neglect, etc.) If they have a concern about a child's mental health, they will record and report so that children can receive appropriate support and early intervention including but not limited to access to sensory toolkits and a trained counsellor.
- If staff believe that a child is in immediate danger, emergency services will be contacted using 999, or arrangements will be made for the child to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs urgent help for their mental health but it is not an emergency, help will be sought through NHS 111.

Prevention and intervention

- Hilltop Primary School will support children's mental health and wellbeing by:
 - promoting positive mental wellbeing and resilience.
 - observing pupils and identifying early those who may be experiencing mental health problems or be at risk of developing them.
 - ensuring early targeted support is considered and provided where appropriate.
 - liaising with and/or referring to specialist services where needed.



- Age and ability appropriate education will be provided to pupils to help promote positive mental health, wellbeing and resilience including but not limited to our assembly program, PSHE lessons and mindful moments.

8.2 Children who are absent from education.

- In line with the [Working Together to Improve School Attendance](#) and [Children Missing Education statutory guidance](#), Hilltop Primary School recognises that when children are frequently absent from education and/or for prolonged periods and/or for unexplained reasons this can be a vital warning sign to a range of safeguarding issues, including abuse and neglect, child sexual exploitation, child criminal exploitation and county lines. 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 and robust action are 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 School 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.
- Where there are concerns that a child has unexplained and/or persistent absences from education, the school will seek local support available from the Medway attendance and children missing education teams

Attendance Team: aassa@medway.gov.uk

Children Missing Education: cme@medway.gov.uk

- Staff are aware of the school's Unauthorised Absence and Children Missing from Education Procedures as outlined in Hilltop's [attendance policy](#).
- Where possible, the school will hold more than one emergency contact number for each pupil, so there are additional options to contact a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm, if for example a court or other legal order preventing access is in place. If this is the case, it will be recorded on the child's safeguarding file.
- Hilltop Primary School will provide information to the local authority where required when a child is removed from roll, including at standard and non-standard transition points, in line with [Children missing education](#) statutory guidance and local procedures.

8.3 Children attending alternative provision

- Hilltop Primary School recognises that children attending alternative provision may have complex needs and may be vulnerable to additional safeguarding risks. Safeguarding arrangements will therefore be considered before, during and throughout the placement.
- When Hilltop Primary School places a pupil with an alternative provision provider, it remains responsible for the safeguarding and well-being of that child. This includes:
 - maintaining accurate records of the provider's address, any subcontracted provision, and satellite sites the child may attend.
 - The school/college will regularly review placement, at least half-termly, to ensure the child is attending regularly, the provision remains safe, and it continues to meet their needs.
 - Prior to placement, appropriate checks will be carried out to confirm the provider can meet the pupil's needs, including written confirmation that all necessary safeguarding checks have been completed for staff working at the provision.
 - If safeguarding concerns arise, the placement will be reviewed immediately and, if necessary, suspended or terminated until those concerns are resolved.
- The DSL will ensure appropriate safeguarding information is shared with the alternative provision provider, in line with information sharing, confidentiality and data protection requirements, so that the child can be safeguarded and supported effectively.
- Hilltop Primary School will respond to any safeguarding concerns relating to a child attending alternative provision in line with this policy.

8.4 Elective Home Education

- Hilltop Primary School recognises that many home educated children have a positive learning experience, and that parents/carers may choose EHE with their child's best interests at the heart of the decision. We also recognise that EHE can mean some children are not in receipt of suitable education and may become less visible to the services that are there to keep them safe and supported.
- Where possible, Hilltop Primary School will work collaboratively with the local authority, parents/carers and other key professionals to ensure that the implications of EHE have been considered by parents before a final decision is made and that all decisions are made in the best interests of the child. This will be particularly important where the child has SEND, an Education, Health and Care plan, is known to partner agencies, or is otherwise vulnerable. Where there are safeguarding or welfare concerns, the DSL will consider whether a referral to children's services is required.
- When a parent/carer intends to withdraw their child for Elective Home Education (EHE), we will respond in accordance with [national Elective Home Education guidance](#) and local Medway procedures.

8.5 Children who have/need a social worker (Child Protection and Child in Need Plans)

- Hilltop Primary School recognises that children may need a social worker due to safeguarding or welfare needs, including abuse, neglect, exploitation or complex family circumstances.
- The DSL will hold and use information about children who need, or have, a social worker so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
- Where a child needs, or has, a social worker, this will inform school decisions about safeguarding and welfare. This may include responding to unauthorised absence, children absent from or missing education, behaviour, pastoral support, academic support and any wider safeguarding risks within the family or community.
- Where appropriate, information will be shared with relevant staff on a need-to-know basis, so the child can be safeguarded and supported effectively.

8.6 Looked after children, children in kinship care, previously looked after children and care leavers

- Hilltop Primary School acknowledges and understands the most common reason for children becoming looked after is because of abuse and/or neglect and/or exploitation, and these children may remain vulnerable.
- Where safeguarding concerns arise for children who are looked after, previously looked after, in kinship care or leaving care, the school will ensure safeguarding action is considered alongside existing care planning, education planning and support arrangements.
- The school has a [designated teacher](#) (David Petty-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, including those in [kinship care](#).
- 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 School 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.)
- Where a child is looked after, the DSL will hold details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child on the child's safeguarding file.

8.7 Young carers

- Hilltop Primary School recognises that young carers may be young carers and have responsibilities for a family member with a long-term illness, disability, mental health need, substance misuse issue or other care needs. This can significantly impact upon a child's wellbeing, relationships and ability to fully participate and achieve in school life.
- Staff will be aware of and alert to indicators that a child may be a young carer, including changes in attendance, punctuality, attainment, behaviour, wellbeing, relationships, tiredness or increased responsibilities at home. Concerns will be recorded and reported to the DSL, using the school's reporting procedures.
- Early identification is important to ensure the right support, at the right time from the appropriate services.
- The DSL will assess support needs and consider appropriate interventions, including pastoral support, reasonable adjustments, attendance or learning support, and referrals to relevant external services
- Where caring responsibilities appear excessive, inappropriate, unsafe, or are significantly impacting the child's welfare, the DSL will consider making a First Response contact.
- The school will signpost and, where appropriate, refer young carers and their families to specialist support services, including local young carers organisations.

8.8 Children who are Lesbian, Gay or Bisexual

- A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm, however, other children can sometimes target them. Hilltop Primary School recognises children who are LGB, or are thought to be LGB by other children, can be singled out by their peers or other individuals in the community and may be vulnerable to bullying, prejudice, harassment and other forms of child-on-child abuse.
- Children who are lesbian, gay or bisexual, or perceived to be, may face greater risks where they do not have reliable adults around them that they feel they can trust and be open with. Hilltop Primary School will provide a safe and inclusive environment where children can speak openly, share concerns and be taken seriously
- LGB education is part of our curriculum for Relationship and Sex Health and Education, and our staff will work to eliminate extra obstacles and create a safe environment that encourages children to voice their concerns.

8.9 Children who are questioning their gender

- Hilltop Primary School recognises that some children may question the way they feel about being a boy or a girl, including the physical aspects of their sex, and the way in which they fit into their community. This may lead to differences in the way these children express themselves. This is not in itself a safeguarding concern and staff will avoid making assumptions based on appearance, behaviour, interests or presentation

- If a pupil or parent requests support around social transition and particular gender-related arrangements Hilltop Primary School will take a considered approach, thinking about the broad range of the individual's needs and taking into account guidance in KCSIE, equality and human rights legislation and relevant school policies and including any clinical advice that is available and addressing wider vulnerabilities such as the risk of bullying. Parents will usually be fully involved, other than in the rare circumstances where involving them would constitute a significant risk of harm to the child, in these circumstances the DSL will be involved before parents are contacted or any decisions are made.
- If staff have any concerns about a child who is questioning their gender, including concerns about bullying, mental health, family response, online harm, self-harm, exploitation or any other safeguarding issue, they will report these to the DSL in line with this policy.

8.10 Safeguarding Children with Special Educational Needs and Disabilities

- Hilltop Primary School understands that children with special educational needs and disabilities (SEND), face additional safeguarding challenges. These children may have an impaired capacity to understand, resist, or avoid abuse. The DSL will work closely with the SENCo to plan learning opportunities and support, as required.
- All staff will ensure that children with SEN and disabilities are able to overcome the barriers that exist for this group of children and specifically ensure that those with communication difficulties are supported to be able to express their voice and that it 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 explicitly showing signs.
- Our school/college has clear policies on intimate and personal care that promote children's health, safety, independence, and dignity. Procedures are transparent and well-documented, with robust record-keeping in place.

9. Online Safety

- Hilltop Primary School recognise that the use of technology presents opportunities, benefits and 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 School will empower, protect and educate the whole school community in the safe 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, including understanding the filtering and monitoring system and processes in place. but will liaise as necessary with other key professionals and members of staff, to ensure online safety concerns are recognised, reported and responded to appropriately.
- Hilltop Primary School 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 content, for example: pornography, racism, misogyny/misandry, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories, AI-generated harmful, misleading or manipulated content, including deepfakes and synthetic media
 - Contact: being subjected to harmful online interaction with other users through social media, gaming platforms or messaging apps. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes. Online coercion and manipulation. Harmful interactions with AI-powered chatbots
 - Conduct: online behaviour that increases the likelihood of, or causes, harm. For example, cyberbullying, consensual and non-consensual making, sharing and receiving nude and semi-nude images, misuse of AI to create manipulated, abusive or harmful content,
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. Subscription traps and in-app purchases. AI-enabled scams and impersonation attempts
- Hilltop Primary School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet, and email systems.
- All school owned devices and systems will be used in accordance with 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 School will ensure a comprehensive whole school curriculum is developed 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. DSLs and SLT may find it helpful to access UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)'
- The school will also support parents and the wider school community (including all members of staff) to be aware of 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.
- The DSL will respond to online safety concerns in line with this and other associated policies such as our behaviour policy.
- 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.

9.1 Remote Learning

- Hilltop Primary School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with safeguarding, privacy, acceptable use, online safety and data protection requirements.
- All remote communication with learners and parents/carers will take place using school approved systems and channels, for example, Hilltop Primary School provided email accounts and phone numbers and agreed systems e.g., Microsoft Teams.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour policy and code of conduct.
- Staff, learners and parents/carers, will be encouraged to report issues experienced during remote/online learning or communication, and concerns will be responded to in line with this and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Policy.
- 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 School will be informed of who from the school their child is going to be interacting with online.

Additional guidance for DSLs and SLT regarding remote learning is available at DfE: [Safeguarding and Remote Education](#)



9.2 Mobile phones and smart devices

- Hilltop Primary School follows the statutory DfE guidance [Mobile Phones in Schools](#) and operates in line with the expectation that schools are mobile phone-free environments by default. Pupils do not have access to mobile phones during the school day, including during lessons, transition times, breaktimes and lunchtimes, except where an agreed exception applies. Any exceptions will be determined by the school leadership team in line with and all relevant policies and with consideration to exceptional individual need,
- Hilltop Primary School recognises the specific risks posed by mobile phones, wearable technology and other smart devices. This includes all devices that can send or receive messages or notifications, connect to mobile networks, record images, audio, video or share location information.
- Hilltop Primary School recognises that safeguarding concerns involving mobile phones, wearable devices and smart technology may arise out of school, but may still affect children's safety, wellbeing, relationships, and learning. Where concerns are identified, they will be reported to the DSL and responded to in line with this policy

9.3 Filtering and Monitoring

Hilltop Primary School ensures that appropriate filtering and monitoring systems are in place on school equipment and systems used by pupils/students and staff, including school devices used by pupils at home. [This link](#) can assist you in understanding your broader responsibilities: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>.

- 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's control, such as mobile phones and other internet-enabled devices and technology. Where concerns are identified, appropriate action will be taken.
- All users will be informed that use of our devices, systems and networks can/will be monitored and that monitoring will be carried out in line with safeguarding, data protection, human rights and privacy legislation.
- Hilltop Primary School ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.
- Impero monitoring blocks school provided internet access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content or activity which promotes hate speech or discrimination, gambling, harmful bullying content, malware/hacking, misinformation, disinformation, privacy and copyright theft, pornography, self-harm and eating disorders and/or violence against women and girls.
- If there is failure in the filtering software, or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
 - Stop using the device or application immediately.
 - Not share, copy, download, screen capture or distribute the material.

- Report the concern without delay to a member of staff, the Designated Safeguarding Lead (DSL), Headteacher or Trust IT team, as appropriate.
 - Record the incident in accordance with the school's safeguarding and online safety procedures.
 - Preserve any evidence where appropriate and safe to do so, without further accessing the material.
 - Co-operate with any subsequent investigation and follow instructions issued by the school or Trust.
 - Ensure that any safeguarding concerns relating to a child are dealt with in line with the school's Child Protection and Safeguarding Policy.
- Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies. This may include but is not limited to, the [Internet Watch Foundation](#) (where there are concerns about child sexual abuse material), [Kent Police](#), [NCA-CEOP](#)
 - Our filtering and monitoring systems are reviewed regularly, at least annually, as part of the school's safeguarding and online safety arrangements. All reviews are recorded

9.4 Generative Artificial Intelligence (AI)

Generative artificial intelligence (AI) offers exciting opportunities in education, supporting children's learning and helping staff reduce workload. However, its use also presents safeguarding risks to both children and staff, as well as potential threats to system security and data integrity.

Further guidance and policy templates can be found here:

- [Generative artificial intelligence \(AI\) in education - GOV.UK](#)
 - [Using AI in education settings: support materials - GOV.UK](#)
 - [Generative AI: product safety expectations - GOV.UK](#)
 - [Generative AI in education: user research and technical report - GOV.UK](#)
 - [Generative AI in education: educator and expert views - GOV.UK](#)
 - [Data protection in schools - Artificial intelligence \(AI\) and data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](#)
 - [Artificial Intelligence and Online Safety | SWGfL](#)
 - [Using artificial intelligence \(AI\) safely | Internet Matters](#)
 - [Integrating AI in Schools: New Policy Template Available | SWGfL](#)
 - [Artificial Intelligence Policy Toolkit – 2026](#)
- Hilltop Primary School recognises the potential benefits of generative AI tools in supporting teaching, learning, and reducing staff workload—when used safely, responsibly, and with appropriate infrastructure. However, we also acknowledge the safeguarding, ethical, legal, and educational risks associated with AI, including exposure to harmful content including the creation or sharing of AI-generated, or digitally manipulated images, data breaches, academic dishonesty, and dis/misinformation.
 - To manage these risks, only AI tools approved by the senior leadership team—following appropriate risk and data protection impact assessments—may be used for educational or work

purposes. A list of approved tools will be maintained and reviewed regularly. Risk assessments include evaluation of whether the tool meets the DfE [Generative AI: product safety standards](#).

- Staff and students will be informed of the benefits, risks, and expectations around AI use through training, policies (such as acceptable use and AI-specific policies), and curriculum content where appropriate.
- AI tools that record, transcribe, summarise and/or generate notes may only be used where approved by the school/college and with full consideration of safeguarding confidentiality, consent, data protection and acceptable use arrangements. If a tool is being used all participants will be made aware and informed of how the information will be captured, used, stored and shared.
- Any concerns about misuse of AI, including digitally manipulated content, nude or semi-nude imagery, harmful impersonation, bullying, harassment, abuse or exploitation will be reported to the DSL and addressed in line with existing policies, including behaviour, safeguarding, data protection, and complaints procedures. Serious concerns, such as AI-generated child sexual abuse material or deepfake abuse, will be handled in accordance with local safeguarding procedures and national guidance, including from the [IWF](#), [CEOP](#), and [UKCIS Understanding and responding to AI-generated child sexual abuse material](#)
- If the school believe that AI tools may have facilitated harassment, including the deepfake abuse of adults, advice and support will be provided to individuals affected, using resources such as, [Professionals Online Safety Helpline](#) or [Report Harmful Content](#) and/or if a crime has been committed, via the Kent Police [deep fakes](#) link. Where this involves staff, actions will be in line with the DfE [Preventing and tackling bullying and harassment of school staff](#).

9.5 Cybercrime

- Hilltop Primary School recognises that [cybercrime](#) is criminal activity committed using computers and/or the internet. Cyber-enabled crime refers to crimes that can happen offline, but are enabled at scale and speed online, such as fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online harassment or other technology-assisted harm. Cyber-dependent crimes are those that can only be committed using a computer, network or internet enabled device and may include hacking, denial of service attacks and making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets or Remote Access Trojans.
- Hilltop Primary School recognises that children with particular skills and interests in computing, may become involved in cyber-dependent crime, sometimes without understanding the legal, ethical or safeguarding implications.
- If staff are concerned that a pupil/student is at risk of/or involved in cybercrime, they will report their concerns to the DSL. The DSL will take actions in line with this policy and local procedures. they may consider making a referral to the [Cyber Choices](#)

10. Complaints

- All members of the school community should feel able to raise or report any concerns they have about children's safety and our safeguarding practice and procedures.
- Hilltop Primary School has a [complaints procedure](#). As a school we encourage pupils 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.
- 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.

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11. Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of this policy and Part One of “*Keeping Children Safe in Education*” (2026) which covers safeguarding information for all staff.
- School leaders and all members of staff who work directly with children will also read Annex A of KCSIE 26, which provides further information to support safeguarding knowledge and practice.
- School leaders, including the DSL, governors and trustees will have a thorough awareness of the entirety of KCSIE.
- All Members of staff sign to confirm that they have read and understood this policy and the sections of KCSIE assigned to them via the CPOMS document vault. Staff must ‘mark as read’ to demonstrate their understanding.
- The DSL will ensure that all new staff and volunteers (including trainee teachers, agency and third-party staff) receive safeguarding training and information to ensure they are aware of the Hilltop’s safeguarding and child protection processes as part of their induction via the school’s safeguarding leaflet and individual training.
- All staff undergo safeguarding and child protection training (including online safety) annually, and at induction. The training is regularly updated. Induction and training are 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 as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This includes refresher training in the Spring term to revisit and reassess staff understanding.
- All staff members (including temporary/supply staff/trainee teachers) will be made aware of the school’s expectations regarding safe and professional practice via the Staff Behaviour Policy, Staff Code of Conduct and E-safety Policy via its inclusion on the staff induction checklist and regular updates in staff briefing.
- The Governing Body recognise the expertise staff build through undertaking safeguarding training and managing safeguarding concerns daily. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.
- The DSL and Head Teacher 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 School has a nominated Safeguarding lead for the Governing Body (Anesa Onyebuchi), 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.

12. 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 are aware of the school's Behaviour and Restrictive 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 the DfE guidance [Restrictive Interventions, including the use of reasonable force in schools](#). All incidents will be recorded in line with guidance.
- There may be circumstances when it is appropriate for staff to use reasonable force to safeguard children from harm. Further information regarding our approach and expectations can be found in our Restrictive Interventions Policy.
- 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, trainee teachers 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, trainee teachers 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.

13. 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.

14. Safer Recruitment

- Hilltop Primary School values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit engage and deploy staff, agency staff, trainee teachers, volunteers and other third-party staff who are safe to work with our pupils/students and staff.
- Hilltop Primary School will use our recruitment and selection process to deter, identify, and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided in line with Section 3 of KCSIE, e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information to aid the school in deciding about the suitability of the prospective employees, trainee teachers and volunteers.
- 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's reputation.
- At least one person involved in interviews will have completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- At all times, the Headteacher will ensure that safer recruitment practices are followed in accordance with the requirements of Part three of KCSIE.
- Hilltop Primary School will determine whether roles, including volunteer roles, are regulated activity in line with updates in KCSIE 26. Appropriate safeguarding checks will be completed before individuals start work or volunteering, as required by statutory guidance. and relevant legislation.
- 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.
- All staff are expected to immediately disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings. Any information shared will be considered proportionately in line with safeguarding, HR, LADO guidance and GDPR
- Where Hilltop places a pupil with an alternative provision, we will obtain appropriate written safeguarding assurance from the provider before the placement starts, including confirmation that relevant safeguarding checks have been completed for individuals working at the provision.
- Where Hilltop organises work experience placements, we will follow the relevant advice and guidance in Part three of KCSIE, including consideration of supervision arrangements, safeguarding responsibilities and any checks required for adults involved in the placement.

15. Allegations Against Members of Staff, including Supply Staff, Trainee Teachers, Contractors and Volunteers

- 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.
- Detailed information regarding allegations about people working at the school can be found within our [Whistleblowing Policy](#). Everyone working at the school, in whatever capacity, should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. The leadership team at Hilltop Primary School will take all concerns or allegations received seriously.
- Hilltop Primary School 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.
- If anyone working at the school has a safeguarding concern that another adult working in, or on behalf of the school has harmed a child, may have harmed a child, or may pose a risk of harm to children, this will be referred to the Headteacher, or their deputy in their absence. The Headteacher will consider whether an onward referral to the LADO is required. If the Headteacher is unsure how to respond, including where it is unclear whether a concern meets the harm threshold, advice will be sought from the LADO in line with local Medway LADO Procedures
- 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/CEO of the trust, 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/Principal or Chair of Governors/CEO should contact the LADO directly on 01634 331065.
- The Headteacher or Chair of Governors/CEO will seek advice from the LADO within 24 hours of the alleged incident. No member of staff, or the governing body/trust, will undertake further investigations before receiving advice from the LADO.
- If a concern or allegation relates to a supply agency worker, trainee teacher, contractor or other third-party member of staff, Hilltop Primary School will liaise with the relevant employer, agency or other organisation as appropriate. It is recognised that this liaison does not remove the school responsibility to take safeguarding action, record decisions and involve the LADO
- Where the concern relates to a trainee teacher, the school will consider the concern in line with Part four of KCSIE, Medway allegations management arrangements and any relevant partnership arrangements with the training provider. Safeguarding action will not be delayed while responsibility for employment, placement or training arrangements are clarified.
- Where Hilltop Primary School receives an allegation relating to an incident that happened when an individual or organisation was using our premises for activities with children, such as

community groups, sports associations or service providers, we will follow our safeguarding policies and procedures and inform the LADO as appropriate.

- At the point of resolution or conclusion of allegations or low-level concerns the Headteacher and LADO (if involved), will consider if there are any lessons to be learned and if any improvements to safeguarding practice can be made.

15.1 Concerns that may meet the "harm threshold"

- Hilltop Primary School that an allegation may meet the harm threshold where anyone working in, or on behalf of, 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 any way that indicates they may not be suitable to work with children.
- Allegations that meet the above criteria will be responded to, and managed, in line with Part four of KCSIE, Medway allegations management arrangements and the reporting process set out above.
- Referrals to Medway LADO are triaged by First Response to ensure support is put in place for any children affected by an allegation. However, the school will also ensure that appropriate safeguarding action is taken to support the child(ren)
- Hilltop Primary School has a legal duty to refer to the Disclosure and Barring Service (DBS) where a person has harmed, or poses a risk of harm, to a child, or where there is reason to believe they have committed one of the relevant offences and they have been removed from working in regulated activity or would have been removed had they not left.

15.2 Concerns that do not meet the 'harms threshold'

- Hilltop Primary School has 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 are in place for confidentially sharing, recording and handling of low-level concerns.
- The Headteacher will listen and gather the facts, then record the concern. They will then speak to the staff member and decide on an appropriate action seeking advice where necessary.
- Low level concerns may relate to professional boundaries, physical contact, communication, conduct and language, digital and online behaviour, professional judgement or appearance outside of school.

- 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 Medway LADO Referral Pathway. It may still be recorded as meeting the Consultation or Advice Pathway.
- Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse. Low-level concern records will be reviewed to identify potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, Hilltop Primary School will consider appropriate action.
- Where low-level concerns are reported, if the headteacher/principal requires advice they should liaise with the LADO Service on 01634 331 065

15.3 Whistleblowing Culture and Procedure

- As part of our approach to safeguarding, Hilltop Primary School fosters and maintains a culture of openness, trust and transparency. Our values and expected behaviours, as set out in our code of conduct, are lived, monitored and reinforced by all adults working in or on behalf of the school, including staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party staff.
- 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. 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.

16. Curriculum and Staying Safe

- Schools play a pivotal and crucial 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. This includes all aspects of safety online
- Through the curriculum and wider safeguarding education, Hilltop pupils are supported to learn about relevant safeguarding themes in an age and ability appropriate way.
- The curriculum at Hilltop Primary School provides opportunities for increasing self-esteem, self-awareness, social and emotional understanding, assertiveness and decision making; this ensures that our pupils/students have a range of strategies to ensure their protection and that they can also protect others.
- Online safety is addressed through the curriculum and other safeguarding education approaches. We support pupils to understand content, contact, conduct and commerce risks, safe and respectful use of technology, privacy, reporting concerns and where to get help. Further information about the school’s wider online safety approach is set out in section 6 of this policy.
- We recognise the crucial role that schools play in preventative education. We have a whole school approach that creates a culture of zero tolerance for racism, ableism, sexism, misogyny/misandry, homophobia and sexual violence/harassment, derogatory behaviours and other forms of violence or conflict.
- The school ensures that those delivering the PSHE curriculum have been trained and equipped to deliver high-quality PSHE education in a safe way. For further information and training on Medway PSHE programs please follow the link: [School PSHE programmes](#).
- Other systems and interventions that exist outside of day-to-day teaching opportunities, classroom interaction and support include assemblies, parent letters and e-safety scenarios for classroom discussion.
- Hilltop Primary School recognises the value of external organisations and/or speakers visiting to provide useful information or to help enrich children’s education. However, the school will always assess the suitability of external organisations or speakers before granting them access to pupils; this may include an assessment of the educational value, the age/ability appropriateness of content and whether relevant safeguarding checks will be required.

17. Restrictive interventions including the use of ‘reasonable force’

- Hilltop Primary School acknowledges that in certain situations, staff may need to use restrictive interventions to safeguard children, staff or others from harm. This refers to actions involving physical contact to control or restrain a child, ranging from guiding them to safety to intervening in more serious incidents such as fights or preventing injury. ‘Reasonable’ means using no more force than necessary.
- Further details on our approach can be found in our [Behaviour Policy](#) and in line with the DfE guidance [‘Restrictive Interventions, including the use of reasonable force in schools’](#). Additional advice is available in Part Two of *Keeping Children Safe in Education (KCSIE)*.

Safeguarding in physical spaces, sport and residential arrangements

- Hilltop Primary School recognises that safeguarding children includes ensuring that physical spaces, activities and overnight accommodation arrangements are safe, appropriate and protect children’s privacy, dignity and wellbeing.
- Toilets, changing rooms, showers and other private spaces will be managed in line with KCSIE, relevant premises requirements, safeguarding duties and the school’s procedures. We will ensure that arrangements promote the safety, comfort, privacy and dignity of all pupils. Any decisions made under this section will be recorded, reviewed and shared with staff who “need to know”
- Where Hilltop Primary School arranges overnight visits, sleeping and accommodation arrangements will be risk assessed and planned to safeguard all children. This will include consideration of supervision, privacy, dignity, individual needs, SEND, medical needs, relationships between children, child-on-child abuse risks and any additional vulnerabilities.

18. The Use of School Premises by Other Organisations

- Where the school premises are let out to other organisations, services or individuals, the headteacher/governing body/proprietor will seek written assurance that the organisations concerned have suitable policies, training and procedures in place regarding safeguarding children and that relevant safeguarding checks have been made for all staff and volunteers. The school will also inspect the supporting documentation as appropriate. Without assurance, applications to use the premises will be refused.
- Where those services or activities are provided under the direct supervision or management of our school staff, our existing child protection and safeguarding arrangements, including this policy, will apply.
- Arrangements are in place to ensure that external providers liaise with the school on safeguarding matters where appropriate, and whenever a concern arises.
- If Hilltop Primary School 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 School will follow their safeguarding policies and procedures, including informing the LADO as they would with any safeguarding allegation.

19. Site Security

- Hilltop Primary School 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 site security and for reporting concerns that may come to light.
- Visitors (including contractors) 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 appropriately accompanied/supervised by a staff member.
- Hilltop Primary School 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.
- Hilltop Primary School will check the identity and purpose for visiting of professionals from partner agencies, such as social workers, Family Help practitioners, health professionals, police officers or other professionals. The school will not routinely require these professionals to provide evidence of a DBS certificate before accessing children, as appropriate safeguarding checks are expected to have been undertaken by their employer (the school will request a letter of assurance to evidence this). If there are any concerns about an individual's identity, purpose or professional status, these will be clarified with the professional's employer or relevant agency before access is agreed, unless doing so would delay an urgent safeguarding response.
- 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. Pupils will be encouraged to report any concerns about strangers on site.
- Hilltop Primary School has a lock-down procedure that is known to all staff and pupils/students and practiced at least termly with one full lock down procedure practised every year.

20. 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 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.
- 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.

DRAFT

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. Children may also cause harm to other family members, this may be referred to as child-to-parent/caregiver 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. 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 hyperlink 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 verbal abuse, such as persistent criticism, belittling, or name-calling 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 hyperlink 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 penetration with an object) 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 hyperlink 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 hyperlink for further information, advice and guidance: [NSPCC Neglect](#)

Appendix 2: Support Links

Support for staff

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

Support for Pupils/Students

- 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
- Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11-year-olds](#) and [12-17-year-olds](#).

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
- We Stand
<https://napac.org.uk/listing/we-stand-formerly-mosac/>
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org

Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex A: Keeping Children Safe in Education 2026

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 2026, 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

- [Violence Against Women and Girls](#) : Government Strategy
- 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

- 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/online-safety 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 3: 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).

- E-safety Policy
- Behaviour
- Attendance
- Behaviour
- Restrictive Intervention
- Complaints
- Data protection and Information sharing
- Emergency Procedures (Incl. evacuation & lock-down)
- First aid
- Health and safety
- Intimate care
- Personal, Social, Health Education and Relationships and Sex Education
- Educational Visits
- Staff Code of Conduct
- Whistleblowing

Appendix 4: 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, if 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. Do not make promises that you cannot 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 must 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 DSL
- The DSL may be required to make appropriate records available to other agencies

6. Relax

- Get some support for yourself



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.

Equality Impact Assessment

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