



**HILLTOP**  
PRIMARY SCHOOL

# Safeguarding and Child Protection Policy

| Key Document Details: |                              |                |                |
|-----------------------|------------------------------|----------------|----------------|
| Author:               | Designated Safeguarding Lead | Department:    | Education      |
| Reviewer:             | Headteacher                  | Version No:    | 2.0            |
| Last Review:          | September 2025               | Next Review:   | September 2026 |
| Approver:             | Governing Body               | Date Ratified: |                |

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# Key Contacts

| Role                                                | Name            | Contact information                                                              |
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| Local Safeguarding Partners                     |                                                                                                                    |                                                                                                                    |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| First Response & SPA                            | For urgent child protection concerns                                                                               | 01634 334466 (Monday to Friday from 9am to 5pm)                                                                    |
| First Response/ Family Solutions                | To request non-urgent support                                                                                      | <a href="#">Portal</a>                                                                                             |
| 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<br><a href="#">LADO referral</a>                                                                      |
| Education Safeguarding Service                  | Advice/Training/ Reviews                                                                                           | 01634 331464 or 01634 331017<br><a href="mailto:educsafeguarding@medway.gov.uk">educsafeguarding@medway.gov.uk</a> |
| Medway Safeguarding Children Partnership (MSCP) | Links to key Medway safeguarding documents, training and processes                                                 | 01634 336 329<br><a href="mailto:mscp@medway.gov.uk">mscp@medway.gov.uk</a>                                        |
| Prevent Education Officer                       | Prevent advice & training                                                                                          | <a href="mailto:Sally.Green2@kent.gov.uk">Sally.Green2@kent.gov.uk</a>                                             |
| 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<br><a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>                                          |



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## Statement of Equality

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

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

### Why are you concerned?

For example:

- Allegation/ child shares a concern or worry
- Behaviour change(s)
- Child's appearance; may include frequent or unexplained injuries/marks/bruises and or clothes
- Witnessed concerning, harmful or inappropriate behaviour

### Immediately record your concerns

Follow the school's procedure on CPOMs

- Reassure the child
- Clarify concerns if necessary (**TED: Tell, Explain, Describe**)
- Use child's own words/ use facts
- Seek support for yourself, if required from DSL

### Inform the Designated Safeguarding Lead – Mrs S Sodhi – Head of School

### 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) 033and/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 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 [MSCP Escalation Procedures](#)
- Follow Whistleblowing procedures [Whistleblowing Policy](#)

# 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 2025**

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, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

Hilltop Primary School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school, children are respected and encouraged to talk openly. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.

Our school acknowledges the need to treat everyone with equity, with fairness, dignity and respect. We recognise that unconscious bias may impact upon our perceptions and expectations of children, particularly those from minority groups and that this may influence the safeguarding actions we take. We seek to educate and challenge all members of the school community to address equality of access and opportunity for all children, by highlighting inequalities and increasing awareness.

Staff challenge any form of derogatory and sexualised language or behaviour. They are vigilant to sexualised/aggressive touching/grabbing. We recognise that groups at particular risk include girls, pupils/students who are, or are perceived to be Lesbian, Gay, Bisexual, Trans or gender questioning, and pupils/students with SEND. We recognise that these children can be targeted by other children and acknowledge the importance of a safe space for them to speak out or share their concerns with members of staff. Pupils/students are protected from up-skirting, bullying (including cyberbullying), homophobic, bi-phobic and transphobic behaviour, racism, sexism, and all other forms of discrimination. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.

This policy applies where there are any child protection concerns regarding children who attend the school/college but may also apply to other children connected to the school/college, for example, siblings, younger members of staff (under 18) or children on student/work placements.

Through their day-to-day contact with pupils/students and their direct work with families, all staff and volunteers in school have a crucial role to play in noticing indicators of possible abuse, neglect and/or exploitation at an early stage. Our school may be the only secure, stable, and predictable element in their lives.

Hilltop Primary School recognises the need for a trauma-informed approach to safeguarding, considering the root causes and possible underlying trauma behind children's behaviour.



Hilltop Primary School will endeavour to support the welfare and safety of all pupils/students through:

- Ensuring that the child's welfare is of paramount importance.
- Training all staff to recognise the signs and symptoms of abuse and to know the school's procedures and lines of communication.
- Ensuring that children's mental and physical health, or development, is not impaired.
- Providing children, a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (Relationships and Sex Education) to help pupils/students stay safe, recognise when they don't feel safe and identify who they might / can talk to.
- Working with parents to ensure they understand the school's legal responsibility to safeguard and ensure the welfare of all children, including the need for referral to other agencies in some situations.
- Keeping confidential records that are stored securely and shared appropriately with other professionals.
- Ensuring the voice of the child is evident in individual case files and informs the school's policy developments.
- Ensuring that the school practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors and contractors.
- Informing parents about expected behaviour.

Hilltop Primary School expects that if any member of our community has a safeguarding concern about any child or adult, they will act immediately.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2025 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2025.

## 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 2025 (KCSIE)
- Working Together to Safeguard Children (WTSC) 2023
- Ofsted: Education Inspection Framework 2019
- Framework for the Assessment of Children in Need and their Families 2000)
- [Kent and Medway Safeguarding Children Procedures](#)
- Early Years and Foundation Stage Framework 2025 (EYFS)
- The Education Act 2002

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



## Legislation

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

## Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023' (WTSC)
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Keeping children safe in education 2025'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

## Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'



- DfE (2024) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'

[Sections 175 and 157 of the Education Act 2002](#) require school governing bodies, proprietors, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils 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.

## Definition of Safeguarding

Safeguarding children is defined in Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2025 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**
- **taking action to enable all children to have the best outcomes**

**(Children includes everyone under the age of 18)**

**Child Protection** – is a part of safeguarding and is defined as activity undertaken to protect specific children from significant harm. this includes harm inside or outside the home or online.

Hilltop Primary School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness



- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Child-on-child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
- Up-skirting

(Also see Annex B within ‘Keeping children Safe in Education’ 2025 p.145)

## Policy Compliance, Monitoring and Review

Hilltop Primary School will review this policy at least annually. The policy will be revised following any national or local policy updates, any significant national events, local child protection concerns and/or any changes to our procedures.

The Governing Body has strategic leadership responsibility for Hilltop Primary School safeguarding arrangements ensure that the school complies with their duties under legislation. They ensure policies, procedures and training in the school is effective and complies with the law at all times

The Designated Safeguarding Leads / Headteacher will ensure regular reporting on safeguarding activity and systems in school to the Governing Body. The Governing Body will not receive details of individual situations or identifying features of families as part of their oversight.

This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

## Key Responsibilities

### Governance and Leadership

The Governing Body and leadership team have a strategic responsibility for our safeguarding arrangements and comply with their duties under legislation.

The Governing Body and leadership team ensure that policies and procedures are in place so that appropriate action is taken, in a timely manner, to safeguard and promote children’s welfare.

The Governing Body have regard to the guidance in KCSIE 2025 and will ensure our policies, procedures and training is effective and always complies with the law.



The Governing Body **ensure that all** governors receive safeguarding and child protection (including online safety) training, appropriate to their role at induction. This training is regularly updated and equips them with the knowledge to provide strategic challenge; to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.

**Anesa Onyebuchi** is the nominated governor for safeguarding, who takes the lead role in ensuring that: the school has an effective policy which interlinks with related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

The Governing Body facilitate a whole school approach to safeguarding. They ensure safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development; so that all systems, processes and policies operate with the best interests of the child at their heart.

The Governing Body regularly review the effectiveness of school filtering and monitoring systems. They/I ensure that the leadership team and relevant staff are:

- aware of and understand the systems in place.
- manage them effectively
- know how to escalate concerns when identified.

The Governing Body and Headteacher ensure that the DSL is suitably supported in their role; has the appropriate status, authority, funding, resources, and training. They assure themselves that the DSL understands they have the responsibility in leading safeguarding and child protection across the school.

## Designated Safeguarding Lead (DSL)

Hilltop Primary school has appointed **Simi Sodhi** (Head of School) 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.

We have appointed **four** Deputy DSLs (DDSLs), who have delegated responsibilities and act in the DSL's absence.

1. **Zoe Mayston – Executive Headteacher**
2. **Caroline Wooder – Assistant Headteacher**
3. **Rachel Harris – FLO**
4. **Katie Osmond - SENCO**

Whilst the activities of the DSL may be delegated to the deputies, the ultimate **lead responsibility** for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The DSL carries out their role as identified in Appendix C of Keeping Children Safe in Education, 2025, 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 (if at any point they are not the DSL) is kept informed of any significant issues by the DSL.

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 school trips and any out of hours/out of term activities

During school holidays, the DSL will provide appropriate emergency contact details to the MASH Education Lead on the understanding that these will only be used if absolutely necessary and will not be shared elsewhere.

**The Designated Safeguarding Lead (DSL) is responsible for fulfilling the duties outlined in Annex C of Keeping Children Safe in Education (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 paper/electronic case management systems to record concerns about pupils/students to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.
- Coordinate safeguarding action for individual children. In the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
- Liaise with the headteacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)
- To liaise with safeguarding partners, other agencies, and staff in line with KCSIE 2025 and WTSC 2023.
- Ensure that Medway referral procedures are followed as necessary (see referral process page 2).
- 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 school or college 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).
- Act as a source of support, advice and expertise for all staff during term time for staff in the school to be able to discuss any safeguarding concerns.
- Understand the importance of information sharing both within the school and with other schools and agencies.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff this will assist with any measures the school may put in place to protect them.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education 2025



## 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.

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 anywhere, 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.
- Understand the early help process and their role in it.
- Be aware of the indicators of abuse, neglect and exploitation, so they can identify cases of children who may be in need of help or protection.
- Understand that children may not feel ready to or know how to tell someone they are being abused, exploited, or neglected and/or that they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. They may feel embarrassed, humiliated or be being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns any about a child.
- Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Build trusting relationships which facilitate communication with children and young people.
- Know what to do if a child tells them that he or she is being abused, neglected or exploited and understand the impact abuse and neglect can have upon a child.
- Know how to maintain an appropriate level of confidentiality.
- Understand and comply with this policy and understand other safeguarding policies and systems.
- Staff help improve and enhance the safeguarding policy through their contributions and development.
- To undertake and engage with regular and appropriate training, that is regularly updated.
- Be aware of, and take appropriate action to raise concerns, about poor or unsafe practice, or potential failures in the school safeguarding regime. (This may include accessing the school whistleblowing policy)
- act in line with our staff code of conduct
- 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.

## Children and Young People

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

- Contribute to the development of school safeguarding policies including creating a child friendly version.
- 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.



- Identify 5 trusted adults.
- Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online.

## Parents and Carers

### Parents/carers have a responsibility to:

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

We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality, and will not share sensitive information, unless we have permission, or it is necessary to do so to protect a child/children.

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

## Recognising Indicators of Abuse and Neglect

As a school we are aware that abuse, neglect and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another, This is outlined locally within the [Medway Threshold Guidance](#).

Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or a deputy).

All staff in school are aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.



**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

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

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

- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school can occur between children outside of these environments. 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 Designated Safeguarding Lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. **Extra-familial harms** take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol, or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## Specific Safeguarding Issues

Hilltop Primary School is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.

Hilltop Primary School staff are mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when



problems first emerge, or where a child is already known to local authority children's social care (such as a Child in Need, or Child Protection, plan).

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, unexplainable absences from education, and sharing nudes or semi-nude images (also known as youth produced sexual imagery) put children in danger. The categories/issues that follow are by no means an exhaustive list but give an indication of the current themes in safeguarding and protecting children.

## Child-on-Child Abuse

Hilltop Primary 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. <https://hilltopprimary.co.uk/wp-content/uploads/sites/6/2024/11/HPS-Child-on-child-Abuse-Policy-v1p0.pdf>

Hilltop Primary School believes and understands the importance of 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". All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.

Hilltop Primary School recognises that child-on-child abuse can take many forms, including but not limited to:

- bullying, including cyberbullying
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- 'up-skirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm
- nude or semi-nude image sharing (also known as 'sexting' or youth produced/involved sexual imagery)
- initiation/hazing type violence and rituals

Staff and leadership recognise that that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, (i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all child-on-child abuse is unacceptable, and all reports will be taken seriously.

In order to minimise the risk of child-on-child abuse, we will:

- implement a robust anti-bullying policy
- providing an age appropriate PSHE and RSE curriculum and ensure children have access to a range of reporting mechanisms.
- work with pupils to ensure they have 5 trusted adults
- have a red button for reporting on the website (monitored by the safeguarding team)



- provide worry boxes

Hilltop Primary School will not tolerate, dismiss or minimise any harmful behaviours in school and will take swift action to intervene when this occurs. All allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with associated school/college policies, including child protection, anti-bullying and behaviour.

Alleged victims, perpetrators and any other child affected by child-on-child abuse may be supported by:

- listening carefully
- avoiding victim blaming
- one of their trusted adults
- providing appropriate pastoral support including support from the FLO and Pupil Wellbeing lead (counsellor)
- working with parents/carers
- reviewing educational approaches
- in cases of sexual assault, informing the police and/or First Response.

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

## Sexual Violence and Sexual Harassment

Hilltop Primary School will follow the guidance outlined in part five of KCSIE 2025. When responding to concerns relating to child-on-child sexual violence or harassment:

If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

[Child on Child Abuse Policy](#) can be found on the school website under the information section, policies and procedures.

Hilltop Primary School recognises sexual violence, and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

Staff must be vigilant and recognise that information may come from overheard conversations or observed behaviour changes. Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated as seriously and in line with relevant policies/procedures, for example **anti bullying, behaviour, safeguarding and child protection, E-safety**.

It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.



Immediate consideration will be given as how to best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.

Where possible, KCSIE 2025 recommends that two members of staff manage reports of sexual violence and harassment.

Reports will initially be managed internally by Hilltop Primary School, where necessary will be referred to Children's Services and/or the Police.

The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off, or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or Hilltop staff; and, any other related issues or wider context.

We will reassure and teach our pupils/students to understand that the law is in place to protect children and young people, rather than criminalise them.

Hilltop Primary School will regularly review decisions and actions to update and improve policies and practice.

The school will consider the physical and mental health implications for both the victim and perpetrator. It is identified that both individuals will need additional support and provision of further information about harmful sexual behaviours and may need signposting to further sources of support.

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

DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Updated March 2024)

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:

- Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.



- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g., if a child has shown it to them), this must be immediately reported to the DSL.
- Not delete the imagery or ask the young person to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

Hilltop Primary School recognises that nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or “sexting”) is a safeguarding issue; this also includes AI produced sexual imagery. All concerns will be reported to and dealt with by the DSL (or a deputy).

The DSL will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate.

Parents and carers will be informed at an early stage and involved in the process of supporting their children, unless there is good reason to believe that involving them would put a child at risk of harm.

A referral will be made to Children’s Services and/or the police immediately if:

- the incident involves an adult (over 18).
- there is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, age or SEND).
- the image/videos involve sexual acts and a child under the age of 13,
- depict sexual acts which are unusual for the child’s developmental stage,
- are violent, or
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time, if further information/concerns are disclosed.

If DSLs are unsure how to proceed, advice will be sought from Children Services.

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

Hilltop Primary School recognises both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Hilltop Primary School recognises that children can become trapped in CCE as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not



always recognised by adults and professionals, (particularly older children), and they are not 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.

The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

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

CSE can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to. To support in identifying the signs of child sexual exploitation please refer to the Kent and Medway [Exploitation Identification Tool](#) and the MSCP Risk [Assessment tool for sexually active young people](#).

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

## Serious Violence

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

Hilltop Primary School recognises that certain factors may increase a child's vulnerability to involvement in serious violence. These include being male, frequent absence or permanent exclusion from school, experiences of child maltreatment, and involvement in criminal activity such as theft or robbery. Additionally, the risk of serious violence may be heightened during times when pupils are travelling to and from school, particularly just before or after the school day.

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

Hilltop Primary 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.



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

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

## Mental Health

Hilltop Primary School will ensure that all staff have an awareness of mental health problems and be aware that in some cases they can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.

Where children have suffered abuse, 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 should attempt to make a diagnosis of a mental health problem. Staff however, are '**well placed**' to identify behaviour indicating a mental health problem or being at risk of developing one.

If staff have a concern about a child's mental health, that is also a safeguarding concern, immediate action will be taken, following the reporting procedures in this policy.

## Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it in their own intimate relationships, can have a serious, long-lasting, impact upon children and is a form of child abuse.

Hilltop Primary School recognises that domestic abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional abuse.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Hilltop Primary School is an Operation Encompass School. This is a national police and education early intervention safeguarding partnership, to support children who witness and experience Domestic Abuse.

Operation Encompass means that the police will share information with our school/college/nursery/setting about all police attended Domestic Abuse incidents involving any of our children, where possible, PRIOR to the start of the next school day.



Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the First Response will be made if there are any concerns about a child's welfare.

Where the school is unsure of how to respond to a notification, advice may be sought from the First Response, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

## So-called 'Honour-Based' Abuse (HBA)

- So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed in the belief that they protect or defend the honour of the family and/or the community. These abuses may include female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.
- All staff need to be alert to the possibility of a child being at risk of HBA or already having suffered HBA.
- If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should immediately follow the school's concern reporting procedures and speak to the Designated Safeguarding Lead (or a deputy). As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's services. Where FGM has taken place, since 31 October 2015 there has been a **mandatory reporting duty** placed on **teachers** that requires a different approach (see following section).

## Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon **teachers**, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils.

The duty does not apply in relation to 'at risk of' or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty [FGM Fact Sheet](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's Designated Safeguarding Lead (or a deputy) and involve children's social care as appropriate.



## Forced Marriage

Hilltop Primary School recognise that since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if **no** violence, threats or another form of coercion are used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. (see page 155 of KCSIE 23) ([Legal age increases to 18](#))

Multi-agency statutory guidance for dealing with forced marriage, which can found at [The right to choose: government guidance on forced marriage](#). Guidance for schools can be found in Section 8. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdof.gov.uk](mailto:fmu@fcdof.gov.uk).

Staff at Hilltop Primary School will use the school's concern reporting system if they have any reason to believe that a child may be at risk of being taken out of the country for the purposes of a forced marriage.

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

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).

If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will and responded to in line with this policy.

## Preventing Radicalisation

The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.

Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).



The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

Every member of staff at Hilltop Primary School recognises that protecting children exposed to radicalisation and extremism is the same as safeguarding against any other vulnerability and should be approached in the same way.

All staff and governors should complete the [Prevent online Awareness training](#) package developed by the Home Office which includes guidance on how to identify people who may be susceptible to being drawn into terrorism, and how to refer them into the Channel process.

Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the [local procedures](#) in regard to making a Prevent referral.

If there is an immediate threat to safety, the police will be contacted via 999.

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, 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](#).

## Supporting Children Potentially at Greater Risk of Harm

### Children who are absent from education

All staff should be aware that children who are **absent from education, particularly on repeat occasions and/or for prolonged periods and/or for unexplainable reasons**, can be a vital of a range of safeguarding issues, including neglect, child sexual exploitation and child criminal exploitation such as 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 is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Hilltop Primary 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 unexplainable and/or persistent absences from education, the school will respond in line with its statutory duties (DfE [Children Missing Education](#)) and local support available from the Medway attendance and children missing education teams

**Attendance Team:** [aassa@medway.gov.uk](mailto:aassa@medway.gov.uk)

**Children Missing Education:** [cme@medway.gov.uk](mailto:cme@medway.gov.uk)

Staff are aware of the school's Unauthorised Absence and Children Missing from Education Procedures. This can be found in the [Hilltop Attendance Policy](#).



Where possible, the school will hold more than one emergency contact number for each pupil, so we have additional options to contact a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm. It is good practice for school to have additional options to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. It is recommended local practice for schools to request and capture emergency contact information for both parents, unless it places a child at risk of harm to do so, for example a court or other legal order preventing access is in place. If this is the case, it should be recorded on the child's safeguarding file. Schools should be proactive in being inclusive of fathers; effective father engagement should be the expectation from the outset, and it is important to help schools understand the child's significant relationships and lived experiences.

## Children attending alternative provision

When Hilltop Primary School places a pupil with an alternative provision provider, it retains overall responsibility 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 placements—at least half-termly—to ensure the child is attending, 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.

## Elective Home Education

When a parent/carers 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

[https://www.medway.gov.uk/downloads/download/598/home\\_education\\_support\\_and\\_guidance](https://www.medway.gov.uk/downloads/download/598/home_education_support_and_guidance)

We will work collaboratively with parents/carers and relevant professionals to ensure decisions are made in the best interests of the child.

## Locked after children, previously looked after children and care leavers

Hilltop Primary School acknowledges and understands the common reason for children becoming looked after is as a result of abuse and/or neglect and/or exploitation, and a previously looked after child potentially remains vulnerable.

The school has appointed a '[designated teacher](#)' (**Simi Sodhi, Head of School / DSL**) who works with local authorities, including the [Virtual School Medway \(including the virtual school head\)](#), 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.)

## **Children who are Lesbian, Gay, Bisexual or Gender Questioning**

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, other children can sometimes target them. Hilltop Primary School recognises children who are LGBTQ+ or are thought to be LGBTQ+ by other children, can be singled out by their peers or other individuals in the community.

When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Hilltop Primary School will refer to the DoFE guidance for Schools and Colleges in relation to Gender Questioning Children when deciding how to proceed.

Children may face greater risks where they do not have reliable adults around them that they feel they can trust and be open with.

LGBT education is part of our curriculum for Relationships Education/Relationship and Sex Education and Health Education, and our staff will work to eliminate extra obstacles and create a safe environment that encourages children to voice their concerns.

## **Safeguarding Children with Special Educational Needs and Disabilities**

Hilltop Primary School understands that children with special educational needs (SEN) and disabilities 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.



Hilltop Primary School 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. [Hilltop Intimate Care Policy](#)

## Online Safety

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

The use of technology has become a significant component of many safeguarding issues. For example, technology often provides the platform that facilitates harm in cases of child exploitation; radicalisation; sexual predation and bullying.

Hilltop Primary School will empower, protect and educate the whole school community in the use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.

The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff.

The DSL and leadership team and Governing Body have read, understood and acted upon all guidance regarding Online Safety within 'Keeping Children Safe in Education' 2025

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, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Hilltop Primary School recognises the specific risks posed by mobile phones, wearable technology and cameras, and, in accordance with KCSIE 2025, has appropriate policies in place that are shared and understood by all members of the school community. Further information reading the specific approaches relating to this can be found in the school's

E-Safety Policy - [E Safety Policy](#)

Filtering and monitoring Policy - [Filtering and Monitoring Policy](#)

Hilltop Primary School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform and email systems.



All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

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 ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.

Hilltop Primary School ensures that appropriate filtering and monitoring systems are in place on school equipment and systems used by pupils and staff. **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 control, such as mobile phones and other internet enabled devices and technology. Where concerns are identified, appropriate action will be taken.

Hilltop Primary School recognises that many pupils and parents will have unlimited and unrestricted access to the internet via mobile phones and other enabled devices, this is external to the school's control. Where concerns are identified appropriate action will be taken.

Hilltop Primary School will ensure a comprehensive whole school curriculum is developed and in place to enable and equip all pupils with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world and manage the risks effectively. **DSLs and SLT may find it helpful to access UK Council for Internet Safety (UKCIS) '*Education for a Connected World Framework*' and DfE 'School' guidance.**

The school will also support parents and the wider school community (including all members of staff) to be aware and alert to the need to keep children safe online. We will share information with parents/carers about:

- what systems are in place to filter and monitor online use,
- what children do online as a part of their learning, including the sites they may be asked to access,
- who from the school their child is going to be interacting with online, as a part of remote learning.

The DSL will respond to online safety concerns in line with this and other associated policies such as anti-bullying and behaviour. Amend as appropriate.

- Internal sanctions and/or support will be implemented as appropriate.
- Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

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



Hilltop Primary School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.

All communication with learners and parents/carers will take place using Hilltop Primary School provided or approved communication channels; for example, Hilltop Primary School provided email accounts and phone numbers and agreed systems Microsoft 365 and teams.

Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour policy and E-Safety Policy.

Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with this and other relevant policies.

When delivering remote learning, staff will follow our [Remote Learning 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.

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

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

## 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](#)
- [Ofsted's approach to artificial intelligence \(AI\) - GOV.UK](#)
- [National AI Strategy - GOV.UK](#)

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, data breaches, academic dishonesty, and misinformation.

To manage these risks, only AI tools approved by the senior leadership team in conjunction with IT—following appropriate risk and data protection assessments—may be used for educational or work purposes. A list of approved tools will be maintained and reviewed regularly.

Staff and students will be informed of the benefits, risks, and expectations around AI use through training, policies, such as acceptable use, and curriculum content where appropriate.

- Staff training
- Internet safety weeks
- Computing curriculum

Any misuse of AI will be 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, NCA-CEOP, and UKCIS.

## Child Protection Procedures

Hilltop Primary School adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website <https://www.medwayscp.org.uk/mscb/>

If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 8 for the flow chart setting out the concern reporting process for staff.

If a child is at risk of imminent danger or harm concerns will need to be referred by telephone to **First Response 01634 334466** and/or the police. **If it is an emergency the police need to be called on 999.**

**If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.**

**Less urgent concerns or requests for support will be referred to Children's Services and Family Solutions via the Medway online form [\(the portal\)](#)**

Once staff have reported their concerns, the DSL will make a decision about what action to take, these include:

- continuing to closely monitor the situation



- managing any support for the child internally, via the school's own pastoral support processes.
- a referral to Family Solutions for an Early Help Assessment
- a referral to Children's Services for statutory intervention.

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

All staff are aware of the process for making contact with Children's Services for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

Wherever possible, the school will share safeguarding concerns, or the intention to refer a child to Children's Services, with parents or carers. **However, staff will not do so where it is felt that 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 the Deputy DSL. They may also seek advice from Early Help co-ordinators **for level 2 ONLY advice Monday – Friday**. If anyone other than the DSL makes a referral to external services, then they will inform the DSL, and Headteacher, as soon as possible.

Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL, so they can reassure themselves the child is safe, and their welfare is being considered. If, in following this process, the staff member remains concerned, it is their responsibility to follow the school's escalation or whistleblowing process.

If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.

If, after a request for support, or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following [MSCP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to First Response if the situation does not appear to be improving or is getting worse (in liaison with the early help practitioner).

Hilltop Primary School is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All staff know what Operation



Encompass is, and there is a clear process for managing notifications in school to the safeguarding team.

### The child's wishes

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

## Preventing radicalisation

The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.

Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

Every member of staff at Hilltop Primary School recognises that protecting children exposed to radicalisation and extremism is the same as safeguarding against any other vulnerability and should be approached in the same way.

All staff and governors should complete the [Prevent online Awareness training](#) package developed by the Home Office which includes guidance on how to identify people who may be susceptible to being drawn into terrorism, and how to refer them into the Channel process.

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

Hilltop Primary School acknowledges and understand the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child potentially remains vulnerable.

The school has a '[designated teacher](#)' (**Mrs S Sodhi, Head of School**) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been



previously looked after.

The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

Hilltop Primary 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.)

## Child Protection Procedures

Hilltop Primary School adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website <https://www.medwayscp.org.uk/mscb/>

If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 3 for the flow chart setting out the concern reporting process for staff.

If a child is at risk of imminent danger or harm concerns will need to be referred by telephone to **First Response 01634 334466** and/or the police. **If it is an emergency the police need to be called on 999.**

**If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.**

**Less urgent concerns or requests for support will be referred to Children's social care and Early Help via the Medway online form ([the portal](#))**

Once staff have reported their concerns, the DSL will make a decision about what action to take, these include:

- continuing to closely monitor the situation
- managing any support for the child internally, via the school's own pastoral support processes.
- a referral to Family Solutions or for an Early Help Assessment
- a referral to Children's Services for statutory intervention.

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

All staff are aware of the process for making contact with Children's Services for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.



Wherever possible, the school will share safeguarding concerns, or the intention to refer a child to Children's Services, with parents or carers. **However, staff will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation.** On occasions it may be necessary to consult with First Response and/or the police for advice on when to share information with parents/carers.

If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the **'No Name' consultation line at Medway First Response (9:30-12:30) on 01634 33 1662.** If anyone other than the DSL makes a referral to external services, then they will inform the DSL, and Headteacher, as soon as possible.

Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL, so they can reassure themselves the child is safe and their welfare is being considered. If, in following this process, the staff member remains concerned, it is their responsibility to follow the school's escalation or whistleblowing process.

If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.

If, after a request for support, or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following MSCP escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to First Response if the situation does not appear to be improving or is getting worse (in liaison with the early help practitioner).

Hilltop Primary School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All staff know what Operation Encompass is, and there is a clear process for managing notifications in school [all notifications from Operation Encompass are added to My Concern and an update is shared with the staff who work with the named child].

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



## Children Who May Benefit from Early Help

Any child may benefit from early help at some point, but all staff should be alert to the potential need for early help for those who:

- Have a disability, a specific additional need or particular health condition.
- Has an SEN, whether or not they have an EHCP.
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour.
- Is frequently missing from education, home, or care.
- Has experienced multiple suspensions, is at risk of being permanently excluded from education – including those who attend a Pupil Referral Unit or Alternative Provision.
- Is at risk of radicalisation.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Has a parent or carer in custody or is affected by parental offending.
- Has challenging family circumstances, such as parental substance misuse, adult mental health issues and domestic abuse
- Is at risk of so-called 'honour-based abuse, such as FGM or Forced Marriage
- Is a privately fostered child.

**Where it is identified that a child may need early help support, staff and the DSL will respond in line with Section Supporting Children potentially at Greater Risk of Harm part of this policy.**

## Record Keeping

Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern about a child or children within our school and when these records should be shared with other agencies.

Our child protection records will 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.

Safeguarding records will usually record facts and not personal opinions. If a staff member records an opinion, such as this should be made 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. If for some reason, you are **directed** to take photos of an injury



by a social worker or police officer, only do so on receipt of an email confirming the name of the person requesting, their role, the date, time, and the rationale behind this decision. Staff can challenge this request if they do not feel comfortable and wait for a social worker/ Police officer to attend.

Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff making the report. If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

Hilltop Primary School staff using the on-line recording system CPOMS for safeguarding concerns. Staff have completed training on how to record information. Visitors or external professionals can complete a paper form kept in the office, this should be handed to a member of the safeguarding team (all visitors have information included on their lanyard of who is on the team) which will then be recorded on CPOMS by the safeguarding team.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are highly confidential and shared with staff on a 'need to know' basis only.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL, within 5 days of the child starting at their new school and a receipt of delivery will be obtained.

## Transferring Child Protection Files

Where children leave the school or college (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be done separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs, or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and to have that support in place for when the child arrives.

If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person, to ensure there is effective transition and handover of information.

Child protection files should always be kept by the education setting where the child is on roll. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc.



Records are kept for children who leave the school without an onward UK placement until the pupil reaches the age of 25.

## Multi-agency Working

Hilltop Primary School identifies that they have a pivotal role in multi-agency safeguarding arrangements. The Governing body ensures that the school or contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2023.

Hilltop Primary School recognises and is committed to its responsibility to work within the MSCP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative relationships with professionals in other agencies, in line with statutory guidance. 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.

Hilltop Primary School recognises the importance of multi-agency working and will provide requested reports and support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or early help multi-agency meetings.

## Confidentiality and Information Sharing

Hilltop Primary School expect 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 and welfare. This will only involve those who need to be involved, such as the DSL and Medway Children's Services.

KCSIE, the [Information Commissioner's Office \(ICO\)](#), DfE [Data Protection in schools guidance](#) and DfE '[Information sharing advice for safeguarding practitioners](#)' guidance provides further details regarding information sharing principles and expectations.

Hilltop Primary School recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2025



The Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection, yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further detail.

Hilltop Primary School an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. The Trust DPO is Tom Heyes.

All staff are aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

## Complaints

Hilltop Primary School has a complaints procedure [Complaints Policy](#) this can be found on our website and on request from the office. As a school we encourage children and families to raise complaints, concerns or comments with us. We have a robust internal investigation process.

Safeguarding concerns should be raised with school immediately. If a child is at immediate risk, then the individual needs to contact First Response 01634 334466 or the police on 101.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 19 of this policy.

## Staff Induction, Awareness and Training

All members of staff have been provided with a copy of Part One of "*Keeping Children Safe in Education*" (2025) which covers Safeguarding information for all staff.

School leaders and all members of staff who work directly with children will read Annex B within Keeping Children Safe in Education 2025.

School leaders and governors including the DSL will have a thorough awareness of the entirety of KCSIE.

All Members of staff sign to confirm that they have read and understood Part One and Annex B of KCSIE. This information is kept on CPOMS.

The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information to ensure they are aware of the Hilltop Primary School's internal safeguarding processes as part of their induction. Safeguarding training will be completed with the DSL or a deputy in person or online.



All staff undergo safeguarding and child protection training (including online safety) at induction. The training is regularly updated. Induction and training is in line with advice from the Medway Safeguarding Children Partnership.

In addition to safeguarding training, all members of staff receive regular safeguarding and child protection updates via weekly emails and staff meetings as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff members (including temporary/supply staff) will be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy and Acceptable Use Policy. There will be induction training for temporary staff.

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/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 **Mrs S Sodhi/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.

## 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 Policy, and any physical interventions must be in line with agreed policy and procedures and national guidance.

A list of staff who have accessed physical intervention training will be kept by the Headteacher/Designated Safeguarding Lead and updated in-line with use of reasonable force DfE guidance in the bound and numbered red book. All incidents will be recorded in line with guidance.

There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our behaviour policy. Behaviour 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 and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in [Guidance for safer working practice for those working with children and young people in education settings May 2019](#) (Safer Recruitment consortium). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in the school's E-Safety Policy.

## Staff Supervision and Support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The induction process will include familiarisation with safeguarding and child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- All staff will be supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will also put staff in touch with outside agencies for professional support if required. Staff can also approach organisations such as their Union, the Education Support Partnership or other support bodies directly.

## Safer Recruitment

Hilltop Primary School values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils/students and staff.

Hilltop Primary School will use the recruitment and selection process to deter, identify, and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and



prohibition checks, together with references and interview information this will aid the school in deciding about the suitability of the prospective employee.

The school will carry out an online search on shortlisted candidates to help identify any issues that are publicly available online which may be relevant to their suitability to work with children and/or may have an impact on the school/academy's reputation.

The Governing Body will ensure that at least one of the persons who conducts the interview has completed safer recruitment training. At all times, the Headteacher and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*,' DfE (2025). [KCSIE](#)

Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: [Safeguarding Children and Safer Recruitment](#)).

The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

Where appropriate we are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

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

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.

All staff, contractors and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team.

Hilltop Primary School understands the duty to refer to the LADO where it is alleged that anyone working in the school has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.



In depth information regarding staff allegations can be found within our Procedures for Managing Allegations against Staff policy. This can be found on the Trust website. All staff and volunteers 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.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:

Allegations should be referred immediately to the Head Teacher or deputy in their absence who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Please refer to the Medway [LADO Leaflet](#) if you need further information.

In the event of allegations of abuse being made against the Headteacher then staff are advised that allegations should be reported to the CEO who will contact the LADO in the first instance.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors should contact **the LADO directly on 01634 331065**.

The Headteacher or Chair of Governors will seek advice from the LADO within 24 hours of the alleged incident. No member of staff or the Governing Body will undertake further investigations before receiving advice from the LADO.

Where headteachers are unsure how to respond, for example if the school is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service has a legal duty to refer to the [Disclosure and Barring Service](#) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.

If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

## Concerns that do not meet the 'harms threshold'

Hilltop Primary School's Staff Code of Conduct explains what a low-level concern is and the importance of sharing concerns. We have 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 available from the office.

A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt') that a member of staff has acted in a way that:



- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).

Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse.

Where low-level concerns are reported, the headteacher/principal should liaise with the LADO Service on 01634 331 065

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

## Whistleblowing Procedure

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team. All members of staff are made aware of the school's [Whistleblowing Procedures](#). 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](mailto:help@nspcc.org.uk).

## 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.

Our curriculum provides opportunities for increasing self-esteem, self-awareness, social and emotional understanding, assertiveness and decision making; this ensures that our pupils have a range of strategies to ensure their protection and that they can also protect others.

Online safety is integrated into the curriculum including online safety weeks.

We recognise the crucial role that school plays in preventative education. We have a whole school approach that creates a culture of zero tolerance for racism, ableism, sexism, misogyny, homophobia and sexual violence/harassment.

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: Anti-bullying policy, assemblies, prefects, pupil voice, on-line red button and worry boxes.

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, 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.

## Use of reasonable force

Hilltop Primary School acknowledges that in certain situations, staff may need to use reasonable force to safeguard children 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 '*Use of Reasonable Force in Schools.*' Additional advice is available in Part Two of *Keeping Children Safe in Education (KCSIE)*.

## The Use of School Premises by Other Organisations

Services or activities provided separately by another organisation from time to time may seek to use the school premises. The Headteacher or Governing Body will seek written assurance that the organisations concerned have suitable policies and procedures in place regarding safeguarding children and that relevant safeguarding checks have been made for all staff and volunteers.

The governing body will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.

Without this assurance then an application to use the premises will be refused.

If Hilltop Primary 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.



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

Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a school visitors lanyard. Our school has a clear system of ensuring visitors are accompanied/supervised by a staff member.

If a visitor or volunteer uses a red lanyard they must be accompanied at all times whilst onsite.

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. [Parent Code of Conduct](#)

Any individual on site who is not known, or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

## Monitoring and Review

All school staff (including temporary/supply staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/guardians on the school website or on request from the office. There is a child friendly version in each classroom.

This policy has been written in September 2025 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.

The policy is included in our school development plan and will be evaluated each year by the governing body, who are responsible for overseeing safeguarding and child protection systems.



# Appendix 1: Definitions of Forms of Abuse/Specific Safeguarding Issues

## Definitions of Forms of Abuse

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Please click on the 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 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 oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.



Please click on the 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](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for Pupils/Students

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Kidscape: [www.kidscape.org.uk](http://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](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)

### Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex B: Keeping Children Safe in Education 2025

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

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

### Support for Learning Disabilities

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

### Domestic Abuse

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

### Honour based Violence (FGM and Breast Ironing)

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- Information and resources <https://www.gov.uk/government/collections/female-genital-mutilation>
- FGM Factsheet: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information: [www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
- 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](http://www.nationalcrimeagency.gov.uk/who-we-are)
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- [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/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)

### Online Safety

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC/ Net Aware: [www.nspcc.org.uk/online-safety](http://www.nspcc.org.uk/online-safety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://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](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)



## 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).

They can be found on the Trust website or on Hilltop Primary School's website.

- Allegations of Abuse against Staff
- Anti-Bullying
- Attendance
- Behaviour
- Complaints
- Data and Information management
- Data Breach
- E-Safety
- First aid
- Health and safety
- Healthy Eating and Drinking
- Information Security
- Intimate Care
- Lettings
- Looked After Children
- Parent Code of Conduct
- Preventing Radicalisation
- Personal and intimate care
- Relationship Health and Sex Education (RHSE)
- Remote learning
- Safer recruitment
- Staff Handbook
- Supporting students with medical conditions
- 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



## Appendix 5: Specific Safeguarding Issues

Hilltop Primary School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced sexual imagery or “Sexting”
- Online safety
- Child-on-child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
- Up-skirting

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

# Equality Impact Assessment

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