



Safeguarding Policy

This policy also refers to and should be read in conjunction with the Harpur Trust Whistleblowing Policy, Reporting of deputy Policy, Dignity at Work Policy and Guidance on Transgender Issues.

Policy statement

1. Trustees, school committee members, senior leadership teams and staff of The Harpur Trust are fully committed to the rigorous implementation of safeguarding procedures and practices in order to safeguard and promote the welfare of all their beneficiaries, employees and others with whom the charity comes into contact so that they do not come to harm¹. Trustees regard this as a key governance priority.

2. The Harpur Trust operates four independent schools, which together educate a large number of young people. Therefore, in particular, the Trustees and staff of the Trust will ensure the protection of children and young people in their care from maltreatment; impairment of health or development; ensure they are growing up in circumstances consistent with the provision of safe and effective care; and take action to enable them to have the best outcomes,² regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. The Harpur Trust also provides accommodation for older people in almshouses, and supports the local community by giving grants to local projects as well as having a programme of social investments and community events.

Policy intention

2. The purpose of this policy is:
- a. to provide Trustees, school committees, senior leadership teams, staff and volunteers with the overarching legal framework and principles that guide our approach to safeguarding.
 - b. to outline the statutory responsibilities of Trustees, school committee members and senior leadership teams and the mechanisms for monitoring compliance in our schools and other activities.

Legal framework

¹ “Strategy for dealing with safeguarding issues in charities”, Charity Commission Policy Paper, 6 December 2017

² “Working together to Safeguard Children 2018” Department for Education 2018.

3. This policy has been drawn up on the basis of law and guidance that seeks to protect children (everyone under the age of 18)³, other beneficiaries, and others the charity comes into contact with, namely:

- a. The Education Act, 2002
- b. Keeping Children Safe in Education, Department for Education, September 2021
- c. Working Together to Safeguard Children, Department for Education, July 2018
- d. Statutory framework for the early years foundation stage, Department for Education, September 2021
- e. Boarding schools, National minimum standards, Department for Education, April 2015
- f. Strategy for dealing with safeguarding issues in charities, Charity Commission, December 2017

4. Independent schools have a statutory duty under section 157 of the Education Act 2002 to safeguard and promote the welfare of all children. Trustees and school committee members have a statutory duty to read and follow government guidance published in *Keeping Children Safe in Education* and *Working Together to Safeguard Children*.

5. Trustees, school committee members and senior leadership teams should ensure that:

- Those staff who work directly with children read at least Part one of Keeping Children Safe in Education 2021.⁴
- Those staff who do not work directly with children read either Part one or Annex A (a condensed version of Part one)⁵
- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in *Part One* (or Annex A if appropriate).⁶
- All Trustees, members of school committees, Heads, Bursars, Designated Safeguarding Leads and Nominated Safeguarding Governors have read the Charity Commission Strategy for dealing with safeguarding issues, and the Trust Policy on reporting serious incidents.

What is safeguarding?

6. Guidance defines safeguarding of children as,

‘...protecting children from maltreatment; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.’⁷

The Charity Commission in their strategy widen the responsibility of Trustees to:

³ *Keeping children safe in education, 2021, summary, p3*

⁴ *Keeping children safe in education, 2021, summary, p4*

⁵ Ibid

⁶ Ibid

⁷ Ibid

“...proactively safeguard and promote the well-being and welfare of their charity’s beneficiaries and take reasonable steps to protect these beneficiaries, and others who come into contact with their charity, from harm...”⁸

7. Therefore, safeguarding in the Harpur Trust is about more than child protection; it is not just about preventing and acting on the worst-case scenarios such as child abuse. Safeguarding is a comprehensive approach that aims to minimise risks to children’s development and life chances by protecting them from potential sources of harm and extending those principles as appropriate to all beneficiaries and others with whom the charity comes into contact.

8. As such, safeguarding is embedded in everyday practices, for example ensuring the safer recruitment of employees and volunteers and that those working with children and young people conduct themselves appropriately. It includes promoting the well-being and welfare of all our employees and ensuring they are treated with dignity and respect and behave appropriately towards each other. It also encompasses how we treat others, including residents of our Almshouses and those outside the Trust, with whom we come into contact, such as parents, grant-recipients, beneficiaries of any wider public benefit, partner organisations and members of the public attending our community events.

Safeguarding principles⁹

9. We are committed to:

- a. **a child-centered approach.** *We recognise a child’s welfare is paramount. Children are listened to and involved in decision-making and the development of safeguarding practices.*
- b. **collective and coordinated responsibility.** *We recognise that safeguarding and promoting the welfare of children and others is everyone’s responsibility and we contribute to effective inter-agency working.*
- c. **openness, transparency and accountability.** *We ensure a clear line of accountability for discharging safeguarding responsibilities and promote transparency in the appropriate and timely recording, reporting and sharing of information. We recognise that abuse can happen in any organisation.*
- d. **a culture of continuous learning and improvement.** *We actively seek opportunities to share and promote good practice across and beyond the Trust.*

Responsibilities

10. Whilst Trustees and school committee members do not become involved in the operational management of safeguarding, they do have an important role to play in the strategic oversight of safeguarding and monitoring of compliance;

⁸ “Strategy for dealing with safeguarding issues in charities”, Charity Commission Policy Paper, 6 December 2017, paragraph 3.

⁹ Informed by *Working together to safeguard children*, 2018, chapter 2, para 4 and Charity Commission Strategy 2017.

'Governing bodies and proprietors have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times'¹⁰.

11. **Nominated Safeguarding Governor.** All Trustees are responsible for ensuring safeguarding is well managed within each school and delegate general oversight of this to the relevant school committee. One governor from each school committee will be nominated to have specific responsibility for oversight of the safeguarding regime as it applies to children in that school and to report on it to the relevant school committee (see also section Monitoring Compliance, below). Appendix 1 provides a description of the duties of the Nominated Safeguarding Governor.

12. **The Designated Safeguarding Lead (DSL).**

*'[An]...appropriate senior member of staff, from the school or college leadership team, [should be appointed] to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety) and should be explicit in the role-holders job description.'*¹¹

The DSL will be the primary contact of the Nominated Safeguarding Governor on safeguarding matters. Schools may choose to appoint one or more deputy designated safeguarding leads. Any deputy designated safeguarding lead will require an equivalent standard of training to the DSL.

The DSL should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.'¹²

Safeguarding policies

13. Effective policies and procedures should be in place in each school in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare in and outside the school environment.¹³ These should include:

- a. An **effective child protection policy** providing guidance on procedures and reporting systems to all (staff, children and young people and their parents/carers) and reflects the whole school approach to peer on peer abuse, online safety,

¹⁰ *Keeping children safe in education*, 2021, Part two, para 78

¹¹ *Ibid*, Part two, para 89 and Annex C, p145

¹² *Ibid*, Annex C, p145

¹³ *Ibid*, Part two, paras 84-85 and recommendations in Hammersmith & Fulham, Kensington and Chelsea and Westminster Safeguarding Board (2016) *Serious Case Review: Southbank International School*,

special education needs and disabilities, and serious violence¹⁴. Procedures are in accordance with government guidance¹⁵ and the local safeguarding partners and relevant agencies.

- b. A **behaviour policy**, reflecting measures to prevent bullying including cyberbullying, prejudice-based and discriminatory bullying.
- c. A **staff behaviour policy** (sometimes called a code of conduct) which should amongst other things include acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.
- d. **Appropriate safeguarding arrangements** to respond to children who go missing from education, particularly those on repeat occasions.

14. Child protection policies should reflect the fact that some groups of children face *additional safeguarding challenges* and that additional barriers can exist when recognising abuse and neglect in children who need a social worker, are missing from education, are in elective home education, require mental health support, are looked after, have special education needs and disabilities or physical health issues¹⁶ and those from minority culture and/or faith.

15. Guidance on the specific safeguarding issues to be included in respective school policies and in over-arching Trust policies can be found in Appendix 2.

Guidance and procedures on safeguarding issues are also contained in grant making policies and policies relating to the Trust's interests in almshouse activities (Almshouse Policy Number 8, Dealing with Abuse). All organizational and covid applicants to the Grants Programme must share details of their safeguarding practices as per the *Safeguarding Compliance Checklist for Grant Applicants* (Appendix 6). If required, the Trust will refer applicants for further training and support and improvements to their safeguarding processes may be a condition of the grant.

Inter-agency working

16. Schools should contribute to effective inter-agency working.

*'Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and **protect them from harm**. This includes providing a coordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.'*¹⁷

¹⁴ Ibid. Further advice provided in 'Preventing youth violence and gang involvement', 2013, and 'Criminal exploitation of children and vulnerable adults: county lines' guidance, 2020

¹⁵ Ibid. and *Working together to safeguard children, 2018*

¹⁶ Informed from *Keeping children safe in education, 2021*, Part two, paras 159-187

¹⁷ *Keeping children safe in education, 2021*, part two, paras 103-104

Information Sharing

17. Information regarding safeguarding matters about young people in our care should be shared effectively, and at the earliest possible appropriate time as *'early sharing of information is the key to providing effective early help where there are problems.'*¹⁸
18. *'The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 do not prevent or limit, the sharing of information for the purposes of keeping children and young people safe.'*¹⁹ 'Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'²⁰ Practitioners working within the Harpur Trust will have due regard to the relevant data protection principles, including the ability to share information without consent if necessary to safeguard children and individuals at risk.
19. All schools will have arrangements in place that clearly sets out the processes and principles for sharing information internally, which will also cover sharing information with other organisations and practitioners, in the best interest of the young person. Detailed records will be kept about information shared, and reasons for sharing it.

Staff training

20. **All staff**
*'...all staff [should] undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners. In addition all staff members should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.'*²¹
21. **Designated Safeguarding Lead**
*'The designated safeguarding lead and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training...their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals and at least annually, to keep up with any developments relevant to their role.'*²²

This training requirement will therefore, develop as safeguarding develops and will include, for example, specific training on Prevent, on-line safety, child criminal exploitation (CCE) and child sexual exploitation (CSE), Peer on Peer abuse, sexual violence and sexual harassment and female genital mutilation (FGM) amongst other specialist issues.²³

¹⁸ *Working Together to Safeguard Children*, DfE (2018) paras 22-23

¹⁹ *Information sharing*, DfE (2018) , p5

²⁰ *Keeping children safe in education*, 2021, part two, para 110

²¹ *Keeping children safe in education*, 2021, part two, paras 114-115

²² *Ibid*, part two, paras 94-95

²³ Informed by and extensive list to be found on *Keeping children safe in education*, 2021, Annex B

22. Non-School Staff

All staff who come into contact with students will undertake safeguarding training and be DBS checked. Training is updated at least every three years and is in line with advice from the local safeguarding partners and relevant agencies.

Training for Trustees and school committee members

23. The Harpur Trust recognises the importance of training in enabling Trustees and school committee members to be confident in discharging their duties and responsibilities for safeguarding and promoting the welfare of children who are pupils in our schools and other beneficiaries.

24. As part of their induction, it is mandatory for all new Trustees and school committee members to participate in safeguarding training. Subsequently, Trustees and school committee members will participate in refresher training at least once every three years.

25. In addition to the safeguarding training above, **Nominated Safeguarding Governors** will receive training on appointment and at least every three years, to enable them to carry out their specific duties. Additional ongoing support will be provided through regular briefings in partnership with schools' Designated Safeguarding Leads.

Online safety

26. To help safeguard children from potentially harmful and inappropriate online material, appropriate filters and monitoring systems should be in place. Online safety training for staff should be *'integrated, aligned and considered as part of the whole school or collegesafeguarding approach and wider staff training and curriculum planning'*.²⁴ Pupils should understand how to stay safe and behave online as part of their curriculum.²⁵

Opportunities to teach safeguarding

27. The school curriculum should be broad and balanced to promote safeguarding, not least through teaching pupils how to stay safe, how to protect themselves from harm and how to take responsibility for their own and others' safety (including the safe use of the internet), teaching them the skills they need for optimum life chances and how to enter adulthood successfully.

28. This includes covering relevant issues for schools through Relationships Education (for primary pupils) and relationships and sex education (for all secondary pupils).²⁶ Schools are encouraged to include teacher training modules on the RSHE topics which may also help in understanding and teaching children about safeguarding.²⁷

Safer recruitment

²⁴ *Keeping children safe in education*, 2021, Part two, para 117

²⁵ *Teaching online safety in school*, DfE June 2019

²⁶ *Keeping children safe in education*, 2021, part 2, para 120

²⁷ Informed by *Ibid*, part two, para 121

28. The Trust recognises that creating a culture of vigilance in relation to safer recruitment is vital in helping deter, reject or identify people who might abuse children. To these ends, the Trust has a written recruitment and selection policy, and procedures that comply with current national and professional safer recruitment guidance. Trustees and school committees have a duty to monitor compliance.

Allegations

29. **Allegations of abuse made against staff and volunteers.** Dealing with allegations of abuse against staff is the responsibility of the Head teacher (and any allegation against a Head teacher is the responsibility of the Chair of the school committee). Schools should have clear whistleblowing procedures in place (please refer to the Trust's [Whistleblowing Policy](#)²⁸), have a policy and procedures for dealing with allegations against staff, and refer cases to the relevant authorities. The Head teacher or Chair of the school committee will follow Part Four of Keeping Children Safe in Education²⁹ when dealing with allegations of abuse made against teachers and other staff, including supply teachers and volunteers and will inform the Trust regarding any allegations and subsequent investigations.

30. **Allegations of abuse made against other children.** It is important that all school staff recognise that children are capable of abusing their peers (peer-on-peer abuse) and that this is reflected in the school child protection policy. The policy should include clear procedures which set out how the risk of peer-on-peer abuse will be minimised and how any allegations will be investigated and dealt with and schools will use the advice available from the 'Sexual violence and sexual harassment between children in schools and colleges,' where appropriate.³⁰ The Trust follows the principle that '*sexual violence and sexual harassment is never acceptable and will not be tolerated*'.

31. **Low Level Concerns**³¹. The Trust's schools promote a culture in which all concerns about adults (including low level concerns) are dealt with appropriately. Schools ensure that all staff (including supply teachers, volunteers, and contractors) are aware of their expectations in accordance to the Trust's Staff Code of Conduct and relevant safeguarding policies.

31. **The child's wishes.** Where there is a safeguarding concern, school leaders and school committee members should ensure that all systems, processes and policies operate with the best interest of the child:

*'... the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback'*³² *'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.'*³³

²⁸ For further details please refer to the Trust's Whistleblowing Policy

²⁹ Keeping children safe in education, 2021, part four, p81

³⁰ Sexual violence and sexual harassment between children in schools and colleges, May 2018

³¹ Informed by Keeping children safe in education, 2021, part four, para 407-408

³² Keeping children safe in education, 2021, part two, para 83

³³ Ibid, Annex B, p141

Monitoring compliance

32. Safeguarding is a standing agenda item at termly school committee meetings and an opportunity for timely reporting and reviewing of safeguarding issues. It is also a standing item on the senior leadership team meetings in the Harpur Trust Office (HTO).

33. Informed by the school's Designated Safeguarding Lead, the Nominated Safeguarding Governor will report at least termly to the school committee using the *termly/annual Safeguarding report to the school committee* (Appendix 3).

34. School committees and the Board will make formal notes in the minutes of their meetings on discussions on safeguarding, including the annual review of safeguarding by the Board.

35. The Chair and Head teacher of each school will bring any matters of significant concern to the attention of the Chair and Chief Executive of the Trust as soon as they arise.

Annual review

36. The schools' Designated Safeguarding Leads in partnership with the Nominated Safeguarding Governors are responsible for ensuring that the respective school's '*child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly*'.³⁴

37. Each school committee will report to the Board annually in the autumn term (for the January meeting) confirming that the safeguarding arrangements in the school have been formally reviewed and meet the statutory requirements, and drawing the Trustees' attention to any significant incidents or themes. Appendix 4 outlines the terms of reference for the annual review.

38. The report to the Board should include a *Termly / Annual Safeguarding report to the school committee* (Appendix 3), which collates or summarises the data presented in that year's termly reports and highlights any themes from previous years, and a completed *Safeguarding Compliance Checklist* (Appendix 5). The Grants Committee will also report annually to the Board on safeguarding in community activities.

39. The Board will formally approve these annual reviews.

Serious Incident Reports to the Charity Commission

40. As a charity, the Harpur Trust has a statutory duty to report serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to a charity's work, beneficiaries, staff volunteers or others who come into contact with the charity through its work
- loss of a charity's money or assets

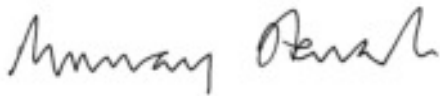
³⁴ *Keeping children safe in education*, 2021, Annex C, p148

- damage to a charity's property
- harm to a charity's work or reputation³⁵

41. Should a serious safeguarding incident occur, then a Serious Incident Report to the Charity Commission needs to be considered by the Chair, Deputy Chair(s) and Chief Executive, in accordance with the Trust's Serious Incident Policy and Charity Commission guidance on charity and trustee duties to safeguard children.³⁶

Policy approval and review

42. This Policy and any changes to it will be approved by the Board. It will be reviewed at least annually and any changes necessary will be recommended in January when school committees report to the Board on safeguarding matters.



Murray Stewart
Chair of the Harpur Trust

September 2021

Appendices:

1. Nominated Safeguarding Governor – Description of Responsibilities
2. Guidance on specific safeguarding issues to be included in respective school policies and in over-arching Trust policies.
3. Termly / annual Safeguarding report to school committee
4. Annual Review of Safeguarding in the school – terms of reference
5. Safeguarding Compliance Checklist for School Committees

³⁵ Policy paper: Strategy for dealing with safeguarding issues in charities, Charity Commission, 6 December 2017

³⁶ "How to report a serious incident in your charity", Charity Commission 22 September 2017

Appendix 1 - Nominated Safeguarding Governor – Description of Responsibilities

Summary of the role

1. Ensuring that Safeguarding is well-managed is the collective responsibility of the Trustees and school committee members³⁷. To ensure that their obligations are discharged efficiently, each of the Harpur Trust's school committees will nominate a governor to have specific responsibility for safeguarding. This is in line with the requirement that schools have 'a senior board level lead to take leadership responsibility for their school's or college's safeguarding arrangements'.³⁸
2. The Nominated Governor will report to the school committee each term to ensure there is a clear link between the school committee members and the school itself on this matter.
3. The role will require close liaison with school's Designated Safeguarding Lead (DSL). The DSL must ensure that the governor is given all the information necessary to enable them to keep committee members informed and thus discharge the Harpur Trust's statutory duty in relation to safeguarding matters.
4. This will require the Nominated Governor and DSL to meet at least once a term and whenever required to liaise on specific issues.

Purpose of the Role

5. The primary purpose of the Nominated Governor role is to ensure that the outcomes for children are met and the school is safe.
6. The Nominated Governor should understand the strengths and weaknesses of the school and play a part in creating the development plan for safeguarding. It is useful for the governor and the DSL to agree a programme of monitoring throughout the year.
7. It is important to remember that the role of the Nominated Governor is not to manage safeguarding within the school but to ensure that it is being properly managed.

Specific duties and responsibilities

8. Nominated Governors will lead on safeguarding compliance and reporting on behalf of Trustees. General guidance on what is required can be found in *Keeping Children Safe in Education* and *Working together to safeguard children*. In practice duties and responsibilities will include:

a. Leadership

- i. champion the promotion of well-being, safeguarding and child protection issues at the highest level within the School;

³⁷ *Keeping children safe in education*, 2021, Part Two, para 78

³⁸ *Working Together to Safeguard Children*, 2018

- ii. encourage other members of the school committee to develop their understanding of the school committee's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties;
- iii. ensure that the school committee puts in place suitable child protection and safeguarding policies and associated procedures which have proper regard to prevailing regulations, guidance, standards and advice;
- iv. be familiar with the Local safeguarding partners and relevant agencies guidance and procedures relating to safeguarding and child protection and associated issues, including local protocols for assessment and the threshold document, contributing to multi and inter-agency working;
- v. contribute to ensuring any deficiencies in the School's safeguarding practices brought to the school committee's attention from any source are investigated and addressed.

b. Supporting the Designated Safeguarding Lead (DSL)

- i. meet regularly with the school's Designated Safeguarding Lead (**DSL**) and any other relevant parties (such as the Nurse or HR Advisor) in order to monitor the effectiveness of the school's child protection and safeguarding policies and procedures and the implementation of these across the School;
- ii. ensure that the DSL is part of the School's senior leadership team, and has sufficient time and resources at his/her disposal to carry out his/her duties effectively;
- iii. ensure that the DSL (and Deputy DSL, if appointed) receive appropriate training to provide them with the knowledge and skills required to carry out the role at least every two years, and that their knowledge and skills are appropriately refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

c. Monitoring

- i. ensure that the school committee is made aware of any proven incident or allegation (anonymised where appropriate) which has implications for the school's child protection and safeguarding policies or procedures;
- ii. ensure that arrangements are in place for the inclusion of child protection training on the School's procedures in an induction programme for all people working in the school, no matter for how long, nor the status of that individual;
- iii. ensure that the School makes opportunities available to staff to feed into and shape the School's approach to safeguarding and safeguarding policies;
- iv. ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers;

- v. review the School's Single Central Register on at least a termly basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies. They will consider conducting unannounced inspections in addition to planned inspections. In addition the NSG should be satisfied that the school has appropriate systems in place to ensure that the SCR is up to date and accurate, and report on this to the school's governing body at the termly school committee meeting.
- vi. ensure that the identity of and contact details for the DSL(s) and Nominated Safeguarding Governor, together with an outline of duties, will be publicised widely within the School community to ensure that pupils, parents, staff and school committees understand the purpose and importance of the roles;
- vii. ensure that the school has an effective and robust method of recording safeguarding concerns and that concerns are recorded in writing at the time the concern arises;
- viii. be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are addressed through the curriculum and schemes of work;
- ix. ensure that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material;
- x. where applicable, ensure that staff have the necessary knowledge and understanding to keep looked after children safe, with identified staff tasked to promote the educational achievement of looked after children.

d. Reporting

- i. ensure that regular risk assessments of factors particular to the school which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special educational needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, child criminal exploitation, female genital mutilation and cyberbullying are carried out and reported to the school committee through the mechanism of the annual report;
- ii. report each term to the School Committee, including a summary of safeguarding matters with particular reference to any incident which has required reporting to the Multi-Agency Support Hub (MASH)³⁹ or, in the case of allegations against staff or volunteer, to the Local Authority Designated Officer (LADO), or which has required the involvement of any external

³⁹ From February 2014, all enquiries regarding children and families in Bedford are to be directed to the Multi Agency Safeguarding Hub (MASH), which as its name implies has membership from the Police, social services, health and education amongst others.

authority, whilst preserving strict confidentiality for the individuals involved (Appendix 3);

- iii. work with the DSL to prepare an annual safeguarding report (to be sent by the School Committee to the Board of the Harpur Trust in the Autumn term for consideration at the January Trust Board Meeting) confirming that the safeguarding arrangements in the school have been formally reviewed and meet the statutory requirements, and drawing the Trustees' attention to any significant incidents or themes;
- iv. support the DSL by overseeing the annual review of the school's Safeguarding policies and arrangements and reporting to school committee on these matters in the Autumn Term, in accordance with the terms of reference set out in Appendix 4;
- v. work with the DSL to identify if any themes are developing that might give cause for concern and reporting these to the Trust Board via the school committee;
- vi. both provide to, and seek from, the local authority and other relevant agencies information about how the Governing Body's duties in respect of safeguarding and child protection have been discharged, if appropriate or requested.

Serious Incident Reporting

9. In the event of a serious incident arising in relation to safeguarding, it may be appropriate for the Chair, Deputy Chair and Chief Executive to make a Serious Incident Report to the Charity Commission.

10. Nominated Governors and Designated Safeguarding Leads should ensure they have read and understood the Harpur Trust Serious Incident Reporting Policy which outlines the criteria to be used to define and identify a 'serious incident' and provides guidance on internal recording and reporting procedures.

Training, advice and guidance

11. In carrying out the role, the Nominated Governor should attend appropriate training and keep up-to-date and well-informed about safeguarding legislation and guidance.

12. The Nominated Governor may seek advice and guidance from other Nominated Governors, the Head, Chief Executive or the Education Development Adviser. If they are in any doubt whatsoever about any matter, they should also discuss it with the Chair of the School Committee.

Appendix 2 – Guidance on specific safeguarding issues to be included in respective school policies and in over-arching Trust policies⁴⁰

Box 1: The school Child Protection Policy should include guidance and procedures in relation to the following specific safeguarding issues:

- ✓ Child abduction and community safety incidents
- ✓ Children and the court system
- ✓ Children missing from education
- ✓ Children with family members in prison
- ✓ Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) Modern Slavery
- ✓ County Lines
- ✓ Cybercrime
- ✓ Domestic abuse
- ✓ Honour-based abuse (HBA)
 - Female Genital Mutilation (FGM) and FGM mandatory reporting duty
 - Forced Marriage
 - Breast ironing
- ✓ Homelessness
- ✓ Information Sharing (Internal & External)
- ✓ Prevent duty and Channel programme - preventing radicalisation
- ✓ Peer-on-peer abuse (including sexting and up-skirting)
- ✓ Sexual violence and sexual harassment between children
- ✓ Upskirting
- ✓ Children with Special Educational Needs and disabilities

Box 2: Additional safeguarding issues to be included in either the Child Protection Policy or other school policies

- ✓ Acceptable use of IT
- ✓ Anti-bullying
- ✓ Attendance
- ✓ Behaviour
- ✓ Complaints procedure
- ✓ First aid
- ✓ Health and safety
- ✓ Managing allegations against staff
- ✓ Missing children
- ✓ Online safety
- ✓ Physical intervention and use of reasonable force
- ✓ Safer perimeter / access to the school
- ✓ Staff code of conduct
- ✓ Supporting students with a medical condition

Box 3: Safeguarding issues covered in The Harpur Trust over-arching HR policies

- ✓ Grievance and disciplinary
- ✓ Health and Safety
- ✓ Recruitment, Selection and Disclosure
- ✓ Whistleblowing

⁴⁰ These lists are not exhaustive and will be under review in light of new policy guidance. For further information about specific safeguarding issues, refer to *Keeping Children Safe in Education (2021)*, Annex B page 125.

N.B. There is a distinction between over-arching Harpur Trust policies which are designed to ensure legal compliance with employment law and school policies which include procedures based on operational demands. Accordingly, there will inevitably be areas of overlap between Trust policies and respective school policies in the area of safeguarding.

Appendix 3 – Termly safeguarding report to school committee

School:

Year:

Table 1: Safeguarding development and training record

| | Evidence / action / date | | |
|--|--------------------------|-------------|-------------|
| | Autumn Term | Spring Term | Summer Term |
| <p>Safeguarding policy and procedures</p> <ul style="list-style-type: none"> • Reviewed in line with KCSIE / WTSC / other relevant documents • Reviewed in line with safeguarding development plans (if appropriate) • Shared with staff • Ratified by School Committee | | | |
| <p>Designated Safeguarding Lead (DSL) and Deputy DSL Training.</p> <ul style="list-style-type: none"> • Training attended • Updates shared • Job description reviewed | | | |
| <p>Staff training</p> <ul style="list-style-type: none"> • In line with KCSIE • Induction of all new staff and volunteers • Safer recruitment training | | | |

School:

Year:

Table 2: Statutory recording and reporting

| | | Autumn Term | Spring Term | Summer Term |
|---|------------------------------|--------------------|--------------------|--------------------|
| No. of Unauthorised absences | Number | | | |
| | Comment if applicable | | | |
| No. of referrals to Child Missing In Education | Number | | | |
| | Comment if applicable | | | |
| Total no. of Children in Public Care / Looked after / Privately fostered | Number | | | |
| | Comment if applicable | | | |
| No. of referrals to LADO (allegation against a member of staff) | Number | | | |
| | Comment if applicable | | | |

| | | | | |
|--|--|--|--|--|
| | | | | |
|--|--|--|--|--|

School:

Year:

Table 3: Record of safeguarding cases and inter-agency working

| | Autumn Term | Spring Term | Summer Term |
|--|-------------|-------------|-------------|
| No. of new safeguarding concerns ⁴¹ referred by staff to DSL | | | |
| No. of new safeguarding concerns referred by DSL to the MASH or Early Help Team ⁴² . | | | |
| No. of children currently receiving support from a school-based professional (including school nurse, counsellor etc.) ⁴³ | | | |
| No. of children currently known to be receiving support from external agencies including Health Service, CAMH, CHUMs etc. who have not been recorded in previous terms' reports. | | | |
| No. of children on 'Early Help Plan' who have not been recorded in previous terms' reports. | | | |
| No. of children on 'Child In Need Plan' who have not been recorded in previous terms' reports. | | | |
| No. of children on 'Child Protection Plan' who have not been recorded in previous terms' reports. | | | |

⁴¹ A 'safeguarding concern' is one that has been referred to the Designated Safeguarding Lead by a member of staff. It differs from a pastoral concern as it directly relates to protecting students from maltreatment; preventing the impairment of their health and development; ensuring that they grow up in circumstances consistent with the provision of safe and effective care; and may require the DSL to take action to ensure the best outcomes for the student.

⁴² For recording purposes, a safeguarding concern is one in which a high-level intervention was considered necessary to protect a child from maltreatment or from impairment of their health or development. In most cases, this will mean an intervention that goes beyond the school's usual system of pastoral monitoring and support (e.g. a referral to social services or other external agency). A new safeguarding concern will refer to a situation in which such an intervention takes place for a child who previously did not have a safeguarding file, OR in which a previously unknown issue has arisen for a child who did have a safeguarding file, which prompted a further high-level intervention.

⁴³ Counselling and Medical Centre Staff should keep a list of children who receive regular support over the course of each term. Medical Centre staff should only report numbers of students they are providing regular support to for safeguarding reasons or for highly complex or undiagnosed medical needs (not routine injuries or clearly known medical conditions such as asthma, diabetes).

| | | | |
|---------------------------------------|--|--|--|
| Summary comment / analysis (optional) | | | |
|---------------------------------------|--|--|--|

School:

Year:

Table 4: Prevalence of specific safeguarding issues

| | | Autumn Term | Spring Term | Summer Term | Annual total |
|--|--|-------------|-------------|-------------|--------------|
| Bullying⁴⁴ | No. of reported incidents | | | | |
| | No. of children bullied | | | | |
| Sexting | No. of reported incidents | | | | |
| | No. of children impacted (subjects of sexting) | | | | |
| Peer-on-peer abuse (not recorded elsewhere) | No. of reported incidents | | | | |
| | No. of children impacted (i.e. victims of peer-on-peer abuse) | | | | |
| Self-harming (including eating disorders) | No. of reported incidents | | | | |
| | No. of children self-harming | | | | |

Comment on any safeguarding developments, concerns or themes:

⁴⁴ Numbers recorded should reflect bullying or cyberbullying cases where it is clear that a child has been subjected to actions that were intended to hurt, embarrass or intimidate (physically or emotionally), normally in a repeated way or in a way that involves an imbalance of power between the perpetrator and the victim.

Form completed by.....

Signed.....Date.....

School:

Year:

Table 5: Serious Incident Reports

| | Autumn Term | Spring Term | Summer Term |
|--|--------------------|--------------------|--------------------|
| No. of serious incidents reported during the period (not all Serious Incidents will be reported to the Charity Commission). | | | |
| No. of serious incidents reported to the Charity Commission | | | |

Appendix 3 – Annual safeguarding report to school committee

School:

Year:

Table 1: Safeguarding development and training record

| | Evidence / action / date |
|--|--------------------------|
| <p>Safeguarding policy and procedures</p> <ul style="list-style-type: none"> • Reviewed in line with KCSIE / WTSC / other relevant documents • Reviewed in line with safeguarding development plans (if appropriate) • Shared with staff • Ratified by School Committee | |
| <p>Designated Safeguarding Lead (DSL) and Deputy DSL Training.</p> <ul style="list-style-type: none"> • Training attended • Updates shared • Job description reviewed | |
| <p>Staff training</p> <ul style="list-style-type: none"> • In line with KCSIE • Induction of all new staff and volunteers | |

| | |
|--|--|
| <ul style="list-style-type: none"> • Safer recruitment training | |
|--|--|

School:

Year:

Table 2: Statutory recording and reporting

| | | 2015/16 | 2016/17 | 2017/18 |
|---|------------------------------|---------|---------|---------|
| No. of Unauthorised absences | Number | | | |
| | Comment if applicable | | | |
| No. of referrals to Child Missing In Education | Number | | | |
| | Comment if applicable | | | |
| Total no. of Children in Public Care / Looked after / Privately fostered | Number | | | |
| | Comment if applicable | | | |
| No. of referrals to LADO (allegation against a member of staff) | Number | | | |
| | Comment if applicable | | | |

| | | | | |
|--|--|--|--|--|
| | | | | |
|--|--|--|--|--|

School:

Year:

Table 3: Record of safeguarding cases and inter-agency working

| | 2015/16 | 2016/17 | 2017/18 |
|--|---------|---------|---------|
| No. of safeguarding concerns referred by staff to DSL | | | |
| No. of safeguarding concerns referred by DSL to the MASH or Early Help Team. | | | |
| No. of children receiving support from a school-based professional (including school nurse, counsellor etc...). <i>Please ensure that if a child receives support across multiple terms in a year please only list once.</i> | | | |
| No. of children receiving support from external agencies including Health Service, CAMH, CHUMs etc... <i>Please ensure that if a child receives support across multiple terms in a year please only list once.</i> | | | |
| No. of children on 'Early Help Plan' | | | |
| No. of children on 'Child In Need Plan' | | | |
| No. of children on 'Child Protection Plan' | | | |

School:

Year:

Table 4: Serious Incident Reports

| | Autumn Term | Spring Term | Summer Term |
|--|--------------------|--------------------|--------------------|
| No. of serious incidents reported during the period (Not all incidents will be reported to the Charity Commission). | | | |
| No. of serious incidents reported to the Charity Commission | | | |

Table 5: Annual analysis of safeguarding issues and emergent themes

| |
|--|
| <p>A) Please identify the most common safeguarding issues raised during the year with any supporting quantitative data.</p> |
| <p>B) Please provide a brief analysis of the above to include consideration of impact and causation and any emergent themes.</p> |
| <p>C) Next steps (what action do you intend / recommend to address the issues raised?)</p> |
| <p>Form completed by..... (HAVE YOU COMPLETED APPENDIX 5 – SAFEGUARDING COMPLIANCE CHECKLIST?)</p> <p>Signed.....Date.....</p> |

Empty header box

D) Next steps (what action do you intend / recommend to address the issues raised?)

Large light blue area for next steps

Form completed by.....

Signed.....Date.....

Appendix 4 – Annual Review of Safeguarding in the school – terms of reference

Purpose

1 The purpose of the annual review of safeguarding in the school is to assure the Board of the Harpur Trust, through the school committee, that:

- policies are compliant with current law and best practice and are adhered to; and
- prompt and appropriate action is taken where concerns are identified; and
- proper records are being kept.

Scope

2 The review must cover all aspects of safeguarding policy and practice within the school, in order that the school committee can be confident it has met its statutory and best practice obligations and report on these matters to the Board of the Trust.

Methodology

3 The review should be instigated by the Nominated Safeguarding Governor in the Autumn Term. It should be conducted by the Nominated Safeguarding Governor and the Designated Safeguarding Lead (DSL) jointly.

4 Reliance should not be placed on verbal assurances alone; checks should be conducted to ensure the policies are compliant and that practice adheres to the policies (Appendix 5 provides a compliance checklist for school committees). In particular, the review should provide assurance that prompt action is taken whenever any concerns are raised about the safety of any child. In addition, checks should also be made to ensure proper records are being kept.

5 The review should analyse data from the current and previous years to establish whether any patterns emerge, which could be a cause for concern.

6 The review should attempt to adduce evidence wherever possible to underpin the findings.

Reporting

7 The Nominated Safeguarding Governor and DSL should report on their findings jointly in writing to the school committee and attend the school committee meeting at which the report is considered in order to answer any questions.

8 The school committee will report to the Board annually in the Autumn Term (for the Board meeting in January):

- to confirm that the safeguarding arrangements and policies in the school have been formally reviewed; and
- to confirm that the school's policies and practice meet the statutory requirements; and
- to draw the Trustees' attention to any significant incidents or themes.

9 The Board will formally approve these annual reviews. School committees and the Board will make formal notes in the minutes of their meetings on discussions on Safeguarding, including on the annual review of Safeguarding by the Board.

Appendix 5 - Safeguarding Compliance Checklist for school committees

Date of completion:

Person(s) undertaking the check:

| | Evidence of compliance e.g. <i>Training Logs, certification, induction checklists, committee meeting minutes etc...</i> | Action req. Y / N |
|---|--|----------------------|
| 1. The Child Protection Policy is publicly available via the school or college website or by other means and parents are made aware of the school's statutory responsibilities in accordance with the policy. | | |
| 2. Staff who work directly with children have read at least Part one of Keeping Children Safe in Education 2021. Staff who do not work directly with children have read either Part one or Annex A. | | |
| 3. There are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of <i>Keeping Children Safe in Education</i> , DfE, 2021 | | |
| 4. The Headteacher and at least one school committee member have completed safer recruitment training. | | |
| 5. The school operates safer recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers who will work with children including all relevant Disclosure & Barring Checks. | | |
| 6. All safer recruitment checks are evidenced in the Single Central Record and this checked regularly for accuracy. | | |
| 7. Procedures are in place for dealing with allegations of abuse against members of staff and volunteers, allegations of peer-on-peer abuse and for low-level concerns that comply with national and local safeguarding partners and relevant agencies guidance. | | |
| 8. A member of the school committee (usually the chair) has been nominated to be responsible for liaising with the LA and partner agencies in the event of an allegation of abuse being made against the Headteacher. | | |
| 9. The school has developed a code of conduct for staff that clearly outlines the school's expectations in relation to the behaviour of all staff and volunteers. This is provided to all staff at induction. | | |
| 10. Designated Safeguarding Lead: A senior member of the school's leadership team has been designated to take lead responsibility for dealing with child protection issues, to provide advice and support to staff and pupils, and work with other agencies and they have received appropriate training to equip them to fulfil the role. | | |
| 11. There is an alternative person identified to fulfil the role in the DSL's absence and there is always cover for this role. | | |
| 12. The school keeps up to date records of all staff safeguarding training including levels of training and dates. | | |

| | | |
|--|--|--|
| 13. The Designated Safeguarding Lead has received Prevent awareness training and the school has appropriate arrangements in place to prevent pupils being drawn into terrorism in line with the Prevent duty. | | |
| 14. The school committee regularly receives a report outlining how the school is fulfilling the statutory requirements for safeguarding; these reports and any identified actions are clearly referenced in the minutes of meetings. | | |

Appendix 6 - Safeguarding Compliance Checklist for Grant Applicants

| | |
|-----------------------|-----------------------------------|
| Name of Group: | Date assessment completed: |
| | |

Is a basic or enhanced assessment required? Is the assessment adequate/ proportionate given nature of safeguarding risk (matrix)

| | |
|---|--|
| Factors to consider | |
| How large is the request? | |
| How vulnerable are the beneficiaries | |
| What activities are being funded – what level of safeguarding risk is there? | |

| Compliance Area | Where is the evidence? How do we know? | Action Required? | Completed Date |
|---|---|-------------------------|-----------------------|
| 1) Does the group work with children or vulnerable adults? If yes go to question 2 If no go to question 13. | | | |
| 2) Is there a safeguarding policy? | | | |
| 3) Is there a safeguarding procedure? | | | |
| 4) Are the above dated, with a timescale for review? | | | |
| 5) Is the policy suitable | | | |
| 5b) Does the policy/procedure cover digital/remote delivery? | | | |
| 6) Is the policy/procedure presented to all staff/volunteers/trustees at induction? | | | |
| 7) Who has had safeguarding training? What training? Where is this recorded? | | | |
| 8) Who is DBS checked? Staff? Volunteers? Trustees? Enhanced or regular? | | | |

| | | | |
|---|--|-------|--|
| | | | |
| 9) Who is the nominated safeguarding officer? | | | |
| 10) How are beneficiaries & their families made aware of the policy/ procedure? | | | |
| 11) How would you identify & assess a safeguarding incident? | | | |
| 12) How many safeguarding incidents do you record in an average year? | | | |
| 13) Is the group a charity ? If so do they know when and how to make a serious incident report? Allegations of neglect abuse or harm to anyone the group comes into contact with. | | | |
| 14) Does the organisation have a whistleblowing policy/procedure? | | | |
| 15) How the board discuss safeguarding? | | | |
| Signed (HT): | | Date: | |