

Document Title:	<i>Focus-Trust Safeguarding and Child Protection Policy</i>
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Author:	Phil Threlfall Safeguarding, Helen Rowland and Andrew Chadwick
Contributors:	Phil Threlfall Safeguarding, Andrew Chadwick
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Related Policies:	<ul style="list-style-type: none"> • School-specific Child protection policies • Working Together to Safeguard Children • Keeping Children Safe in Education • Statutory Framework for the Early Years Foundation Stage • Disqualification Child Care Act • Data privacy notices, staff, pupils, staff, volunteers, governors and trustees

Safeguarding and Child Protection Policy

September 2025

- 1 The person responsible for safeguarding and child protection at Trust level is:**
Andrew Chadwick, Safeguarding, Ambition and Inclusion Lead (SAIL) who can be contacted internally by mobile or Teams or externally through info@focus-trust.co.uk
- 2 Safeguarding commitment**
 - 2.1** This document sets out the parameters for dealing with safeguarding issues across Focus-Trust. The Trust is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. We will comply with statutory requirements and adopt a best practice approach to safeguarding and safer recruitment at all times.
 - 2.2** 'Working Together to Safeguard Children' defines safeguarding and promoting welfare as:
 - providing help and support to meet the needs of children as soon as problems emerge;
 - protecting children from maltreatment, whether that is within or outside the home, including online;
 - preventing impairment of children's mental and physical health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
 - promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
 - taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.
 - 2.3** It is Focus-Trust's intention that we should do all we can to support and promote children's welfare and to protect them from abuse and neglect.
 - 2.4** We also acknowledge that, under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. Moreover, they have obligations under the Equality Act 2010 and must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
 - 2.5** We also intend to do all that we can to promote educational outcomes by knowing the welfare, safeguarding and child protection issues that vulnerable children and those in need are experiencing, or have experienced. This means identifying the impact that these issues might be having on children's

attendance, engagement and achievement at school.

3 Compliance

3.1 The Focus Trust's policies, procedures and practice comply with statutory guidance and, where relevant, locally agreed safeguarding [partner] procedures, protocols and arrangements.

Core Guidance

- [Working Together to Safeguard Children](#) (2023)
- [Keeping Children Safe in Education](#) (2025)
- [Statutory Framework for the Early Years Foundation Stage](#) (2025)
- Prevent duty: Departmental advice for schools and childcare providers
[Prevent Duty Guidance 2023](#)

Additional Guidance (this list is not exhaustive)

- What to do if you're worried a child is being abused (2015)
[What to do if you are worried](#)
- Information sharing advice for safeguarding practitioners (2018);
[Information sharing advice for practitioners](#)
- Guidance for Safer Working Practice for those working with children and young people in education settings (Safer Recruitment Consortium, Feb. 2022)
[GSWP Feb 2022](#)
- Behaviour in Schools: Advice for Headteachers and school staff (Dept, for Education, 2024)
[Behaviour in Schools, 2024](#)
- Working together to improve school attendance (DFE, 2024)
[DFE Improving attendance 2024](#)
- Preventing and Tackling Bullying (DFE, July 2017)
[Preventing and Tackling Bullying](#)
- Searching, Screening and Confiscation: Advice for Schools (DfE, July 2022)
[Searching, Screening & Confiscation July 2022](#)
- The designated teacher for looked after and previously looked-after children: Statutory guidance on their roles and responsibilities (February 2018)
[Designated Teacher for LAC and previously LAC](#)
- Promoting the Education of Children with a Social Worker: Virtual School Head role extension (DFE, June 2024)
[Children with a SW: VSH role Extension 2024](#)
- Mental health and behaviour in schools (2018)
[Mental Health and Behaviour](#)
- Teaching online safety in school (2023)
[Teaching Online Safety](#)
- Meeting digital and technology standards in schools and colleges
[Filtering and monitoring standards 2024](#)
- PHE Promoting children and young people's emotional health and wellbeing: A whole school and college approach
[PHE whole school positive MHWB 2021](#)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education: Statutory guidance for governing bodies, proprietors, head

teachers, principals, senior leadership teams, teachers (2019)

[RSE and Health Education](#)

- Multi- agency statutory guidance on female genital mutilation: HM Govt. July 2020)

[FGM statutory guidance](#)

4 Related Trust and School documentation

4.1 This policy should be read alongside the following Focus-Trust documents:

- School Recruitment Guidelines;
- IT, Online Safety and Acceptable Use policies;
- Intimate care protocol and guidelines;
- Looked After Children policy;
- Photographic images policy;
- DBS and single central record policy;
- Staff code of conduct;
- Low Level Concerns policy;
- Managing Allegations;
- Whistle-blowing;

5 Responsibilities

5.1 Trust Responsibilities

- Ensure that statutory safeguarding and child protection responsibilities are met by all schools in the Trust;
- Ensure that the Trust's commitment to safeguarding children is met by all Trustees, governors and staff and contractors working in and / or on behalf of the Trust;
- Lead and oversee a safeguarding culture across the Trust and its schools, characterised by ongoing vigilance and review.

5.2 School Responsibilities

Governing bodies and the Principal / Headteacher must ensure that statutory safeguarding and child protection duties and responsibilities are met. This includes:

- Having in place an school-specific safeguarding and child protection policy which complies with Keeping Children Safe in Education 2025 and which is consistent with locally agreed / safeguarding partner arrangements, protocols and procedures;
- Ensuring that a DSL is appointed in-line with statutory guidance, and that there is always cover for this role in the school. The DSL also has lead responsibility for online safety.
- Put mechanisms in place to assist staff to understand and discharge their role and responsibilities as set-out in statutory guidance;
- Promote safeguarding and child protection in partnership with parents and external agencies;
- Ensure that all governors, staff and volunteers receive appropriate and regular training in-line with statutory guidance and advice from local safeguarding partners, including for new staff as part of induction. (This includes online safety, including filtering and monitoring arrangements and responsibilities)
- Ensure that a Single Central Record is maintained which is compliant and fit for

purpose.

5.3 **Staff Responsibilities**

- To follow all Trust and school policies with regard to safeguarding and child protection. To this end, minimally, everyone must read and understand:
 - Part one and, especially if they work directly with children, Annex B of Keeping Children Safe in Education (2025)¹;
 - their school's latest safeguarding and child protection policy and procedures;
 - the behaviour policy;
 - the staff code of conduct - including any associated guidance on Acceptable Use / Online Safety and the management of low level concerns.

- 5.4 In particular, all staff should ensure that they are confident and clear about:
- the processes for identifying a need for early help and how to access and contribute effectively to early help processes;
 - what to do in the event that a child is in immediate danger, suffering or at risk of suffering significant harm²;
 - how to help keep children safe online, including in-school arrangements for filtering and monitoring
 - how to identify and respond to any issues or concerns about mental health and wellbeing;
 - how to implement the Trust's zero tolerance approach to child-on-child abuse of *any* kind - this includes harmful sexual behaviour, sexual violence and sexual harassment, whether online, in or out of school, recent or non recent, including:
 - how to prevent it,
 - what to look out for
 - how to break down barriers to give children and families a voice,
 - how to respond to, report and record any concerns or allegations;
 - their role in promoting good attendance, including the school's [safeguarding] response to non-attendance, children who are absent or who go missing from education and ongoing responsibilities in respect of safeguarding any children who are accessing alternative provision;
 - the identities and roles of Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs).

6 Concerns About Safeguarding Practice or Culture and Whistleblowing

- 6.1 Where staff have concerns about safeguarding practice, systems or culture they should discuss those with the school Principal / Headteacher. If concerns remain, they should speak to the Trust's representative for safeguarding and child protection, i.e. the SAIL.

- 6.2 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and feel confident that any such concerns will be taken seriously by senior leaders.

- 6.3 Appropriate whistle-blowing procedures, which are reflected in staff training

¹ Support staff may choose to read Annex B but must read Part One or Annex A (a condensed version of it)

² See KCSIE 2025 flowchart

and the Focus Trust Code of Conduct, are in place and any such concerns can and should be raised with:

- The school Principal / Headteacher in the first instance; or
- The Focus Trust SAIL

- 6.4 Where a staff member feels unable to raise an issue with either or both of the above, for whatever reason, or feels that their genuine concerns are not being addressed, other [whistle-blowing] channels are open to them:
- General guidance can be found at: <http://www.pcaw.org.uk/>
 - The [NSPCC whistleblowing helpline](https://www.nspcc.org.uk/whistleblowing) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
[-https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies](https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies)

7 Safeguarding and Child Protection Policies and Procedures

- 7.1 Each school must have in place a school-specific Safeguarding and Child Protection Policy which makes clear the procedure to follow in dealing with child protection concerns and incidents. This Policy must be consistent with and reflect statutory and non-statutory guidance, local [safeguarding] partner arrangements and procedures and the school's own context. It will be reviewed regularly, i.e. at least annually, and signed-off by governors. All school-based staff should have a copy.
- 7.2 Each school will promote the protection and welfare of children in partnership with parents, carers and colleagues from other agencies. They will work professionally, transparently and in children's best interests at all times.
- 7.3 Parents and carers are informed of the school policy on safeguarding and child protection, including how we keep children safe online, through the school website. Parents are asked to acknowledge their understanding of this at the start of each academic year.
- 7.4 Relevant safeguarding and child protection policies, procedures and documentation (see paras. 5.3-4) are included in the induction package for all new staff.

8 Training and induction

- 8.1 It is the responsibility of each school's governors and the Principal / Headteacher to ensure that appropriate and up-to-date trustee, governor and staff training takes place in-line with statutory requirements.
- 8.2 All governors and trustees receive appropriate safeguarding and child protection (including online safety, filtering and monitoring) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly

updated.

- 8.3 Designated Safeguarding Leads (DSLs) and Deputy DSLs will be trained to the same 'level', in line with KCSIE 2025, Annex C and advice from local safeguarding partners.
- 8.4 The content of safer recruitment training will comply with KCSIE 2025
- 8.5 A record of this training, showing names, dates and training provider, should be retained centrally and available for inspection.
- 8.6 New staff and volunteers must receive information about safeguarding and child protection as part of the induction process. Safeguarding will be integral to induction for all staff. Schools will adopt a proportionate, risk-based approach to the level of information that is provided to ancillary, temporary staff and volunteers, e.g. see KCSIE 2025, Annex A for example.

9 The single central record (SCR)

- 9.1 Each school must maintain a single central record (SCR). Minimally, the SCR will comply with Keeping Children Safe in Education 2025, Part three. It will be checked by Ofsted and can be checked at any time by a nominated governor or Focus-Trust representative.
- 9.2 Schools have a legal duty to report to the DBS anyone who has harmed, or poses a risk of harm to, a child or vulnerable adult where:
 - the harm test is satisfied in respect of that individual;
 - the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
 - the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left
- 9.3 The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended

10 Dealing with allegations of abuse against staff and volunteers³

- 10.1 It is essential that any allegation of abuse made against a teacher⁴, other member of staff or volunteer are taken seriously and dealt with fairly, quickly, and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation.
- 10.2 Where schools receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children, as with any safeguarding allegation, the school will follow its safeguarding policies and procedures, including

³ For further detail see Focus Trust's Policy for Managing Allegations Against Staff and Volunteers (September 2023) and flowchart p.11

⁴ This includes supply teachers - see KCSIE 2025.

informing the LADO.

- 10.3 Focus-Trust will always adhere to the framework and procedure for managing allegations provided by Working Together to Safeguard Children and Keeping Children Safe in Education 2025, Part four, section one. This will be implemented in-line with the school-specific Safeguarding and Child Protection Policy and locally agreed safeguarding partner / LADO arrangements and procedures.
- 10.4 The Focus-Trust will always liaise and cooperate fully with the relevant local authority's designated officer (LADO). The Principal or Head of HR will immediately consult with the designated officer regarding any allegation that appears to meet the criteria of Part four of Keeping Children Safe in Education 2025.
- 10.5 As a general rule, the Focus-Trust staff involved in the management of allegations will be:
- Safeguarding, Ambition and Inclusion Lead (SAIL)
 - Chief Operating Officer
 - Chief Executive
 - School Principal/Head Teacher (except where there is an allegation against the Principal)
- 10.6 When an allegation is made, the school and Focus-Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 10.7 It is important that a clear and comprehensive record of any allegations made, i.e. details of how the allegation was followed up and resolved, any action taken and decisions reached. This will be kept on a person's confidential personnel file, and a copy provided to the person concerned.
- 10.8 Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.
- 10.9 The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
- 10.10 **Investigations**
Where initial consideration in consultation with the local authority's designated

officer decides that the allegation does not involve a possible criminal offence, it will be for the employer to deal with. In such cases, if the nature of the allegation does not require formal disciplinary action, the Principal / Headteacher should institute appropriate action within five working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held in line with the disciplinary procedure.

Where further investigation is required to inform consideration of disciplinary action the Principal / Headteacher and the COO adviser should discuss who will undertake that with the Chief Executive. In some circumstances it may be appropriate for the disciplinary investigation to be conducted by a person who is independent of the school. In any case the investigating officer should aim to provide a report to the employer within ten working days.

On receipt of the report of the disciplinary investigation, the Principal / Headteacher and COO should decide whether a disciplinary hearing is needed within two working days. If a hearing is needed it should be held in line with the agreed procedure.

10.11 Action in respect of false or malicious allegations

If an allegation is determined to be false, the LADO may refer the matter to children's social care to determine whether the child concerned is in need of services, or may have been abused by someone else. In the rare event that an allegation is shown to have been deliberately invented or malicious, the Principal / Headteacher will consider whether any disciplinary action is appropriate against the pupil who made it, or the police may be asked to consider whether any action might be appropriate against the person responsible if s/he was not a pupil.

10.12 Managing the situation, resignations and 'settlement agreements'

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. A referral to the DBS *must* be made, if the criteria are met - see 9.2-3. Schools must also consider whether a referral to the TRA is appropriate - see KCSIE 2025.

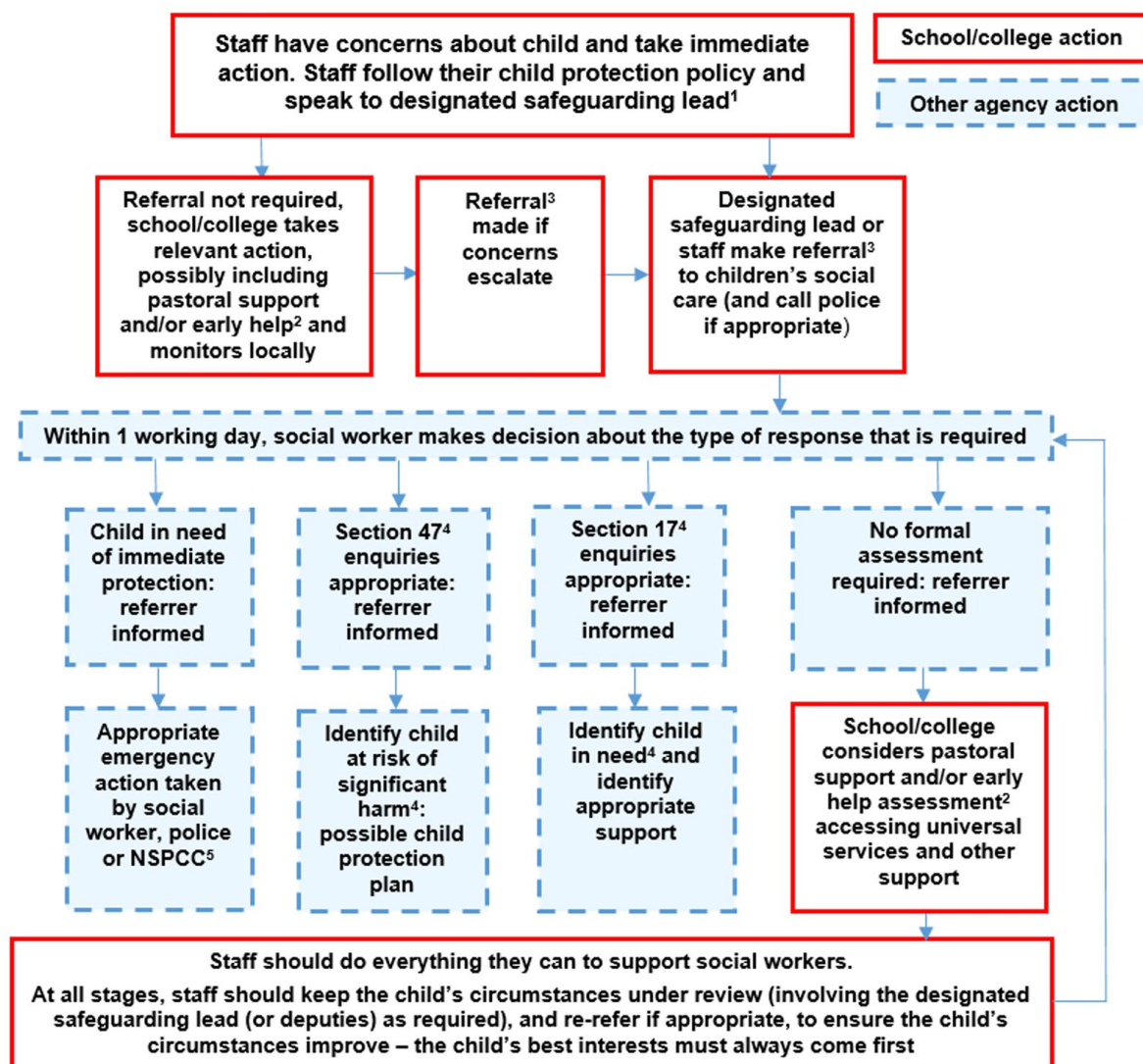
If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because the school would not be complying with its legal duty to make the referral.

11.0 Managing Low Level Concerns

- 11.1 Focus Trust and its schools will adhere to KCSIE 2025, Part four, section two and the School / Trust's Low Level Concerns Policy. This makes it clear that the term 'low-level' does not mean that it is insignificant; rather, the behaviour towards a child does not meet the [harm / allegations] threshold. Low level concerns are discussed as part of induction; they are also discussed in the staff code of conduct and safeguarding and child protection policy and procedures.

- 11.2 Concerns relating to a member of staff, supply staff, a volunteer or contractor should be reported in the same way as would an allegation, i.e. to the Principal / Headteacher or, if the concern relates to them, to the Chair / SAIL.
- 11.3 The person receiving the concern will make a written record which includes:
- the name and role of the person raising the concern (unless they wish to remain anonymous, in which case this will be respected as far as reasonably possible),
 - details of the concern itself,
 - the context in which it arose,
 - action taken including advice, support, training, instruction;
 - the outcome / how the matter was resolved.
- 11.4 Reports about supply staff and contractors will be notified by these senior personnel to their employers, so that any potential patterns of inappropriate behaviour can be identified, monitored and managed and so that appropriate support or guidance might be provided.
- 11.5 Any and all records will be maintained securely, in-line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 11.5 Schools must only refer to substantiated safeguarding allegations in references. Therefore, low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.
- 11.6 A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it can and will be referred to in a reference.

Keeping Children Safe in Education 2025 Flowchart



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of KCSiE 2025.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children

Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.

5. This could include applying for an Emergency Protection Order (EPO).

Process for Managing Allegations KCSIE 2024, Part 4, Section 1

KCSIE 2024 defines an allegation as information which indicates an adult 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; or**
- **behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children**
- **behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

Person receiving information or observing incident records basic facts

Report to Principal who becomes the Case Manager

(Report to Chair of Governors (and Focus Trust CEO) if Allegation is against Principal)

- Case Manager gathers basic information, begins timeline / record & manages immediate risk
- Case Manager may seek advice via HR / Working with Schools
- **Any allegation which meets or may meet the above criteria MUST be reported IMMEDIATELY to the Local Authority's Designated Officer**
- Nature and context discussed and next steps agreed, including information sharing

- Following HR, LADO and any CSC / Police advice case manager ensures appropriate information is shared and support provided to those involved.

Agreed that Matter to be Dealt with in by School / Employer

- Ensure appropriate support for all
- Case Manager records, including formal outcome on HR file
- Consider any learning & share with

Formal External Referral

- Case Manager completes referral to LADO **and** any onward consultation / referral(s) to Children's Social Care and Police
- Discuss with HR / WWS **0161707 1520**

Employer's internal action

Strategy Meeting

Police enquiries

s47 / CP enquiries

Unfounded

False

Malicious

Unsubstantiated

Substantiated

Manage confidentiality, speculation, leaks, gossip and any media issues in consultation with Trust

Once external enquiries and processes have run their course

Case manager discusses with LADO and HR whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. DBS and TRA referrals made as required where harm test is met.

This procedure applies to all adults, inc. supply staff, volunteers & OOSS