



HUET POLICY

SAFEGUARDING POLICY

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1 Statement of intent

The Hanley & Upton Educational Trust (HUET, 'the Trust') is committed to safeguarding and promoting the welfare of every child in its schools. The welfare of the child is paramount. Everyone who works for, or on behalf of, the Trust has a part to play in keeping children safe, and everyone should keep the attitude that 'it could happen here'.

This is the Trust's overarching safeguarding policy. It sets out how the Trust Board, as the proprietor of each academy, meets its statutory safeguarding responsibilities, and the standards that every school in the Trust must meet. It does not replace each school's own Safeguarding and Child Protection Policy. Instead, it sits above those policies and makes sure that they are consistent, compliant and well led.

This policy aims to make sure that:

- children in every Trust school are protected from maltreatment, abuse, neglect and exploitation, whether inside or outside school, and online or offline;
- the impairment of children's mental and physical health or development is prevented;
- children grow up in circumstances consistent with the provision of safe and effective care;
- action is taken so that all children have the best outcomes;
- concerns are identified early, shared promptly and acted on, so that children and families receive the right help at the right time;
- the Trust Board, Academy Standards Committees (ASCs) and leaders have clear, reliable assurance that safeguarding is effective in every school; and
- there is a culture of openness and vigilance in which children feel safe, are listened to and are taken seriously, and adults feel confident to raise concerns, including about other adults.

The Trust's approach is child-centred. We will consider at all times what is in the best interests of the child, and we will seek, listen to and act on children's wishes and feelings.

2 Scope and how the Trust's safeguarding policies fit together

This policy applies to all Trust schools, which are currently Hanley Castle High School, Hanley Swan Primary School, Kempsey Primary School and Welland Primary School. It also applies to the Trust's central team, to Trust-wide events and activities, and to any setting or activity for which the Trust is responsible.

It applies to all adults working in or on behalf of the Trust, including trustees, members of ASCs, the Chief Executive Officer (CEO) and central staff, headteachers, teaching and support staff, supply and agency staff, trainee teachers, volunteers, contractors and visitors.

The Trust's safeguarding arrangements are set out at two levels:

- **The Trust Safeguarding Policy (this policy)** sets out the legal framework, governance and accountability, the Trust-wide standards every school must meet, the routes for allegations about senior leaders, and how the Trust gains assurance that safeguarding is effective.
- **Each school's Safeguarding and Child Protection Policy** sets out the day-to-day procedures in that school: its named safeguarding staff, how staff raise and record concerns, local referral routes, its curriculum for teaching safeguarding, and arrangements that reflect the school's phase and context (for example, early years provision or a sixth form). School policies are based on the Worcestershire model safeguarding policy, adapted for each school.

Each school's policy must include, as a minimum, the content set out in Annex A. Each school policy should state that it is to be read alongside this policy.

Where a school policy differs from this policy, this policy takes precedence, unless the school policy sets a higher standard. Where either policy differs from statutory guidance, the statutory guidance takes precedence, and the policy will be updated.

All staff must read Part one of Keeping Children Safe in Education (KCSIE) 2026 in full. Trustees, ASC members, headteachers and designated safeguarding leads (DSLs) must also read Part two of KCSIE, which covers the management of safeguarding.

3 Definitions

Safeguarding and promoting the welfare of children means providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether inside or outside the home, including online; preventing the impairment of children's mental and physical health or development; making sure 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.

Child protection is part of safeguarding. It refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

In this policy:

- **'child'** means anyone under the age of 18. This includes pupils aged 16 and 17 in the sixth form at Hanley Castle High School;
- **'staff'** means anyone working in or on behalf of the Trust or its schools, whether paid or unpaid, including the central team, supply and agency staff, trainee teachers and volunteers;
- **'parents'** includes carers and anyone with parental responsibility;
- **'the Trust Board'** means the board of trustees, which is the proprietor of each academy and is accountable in law for safeguarding in every Trust school;
- **'ASC'** means the Academy Standards Committee of each school, which carries out the safeguarding functions delegated to it by the Trust Board in the Scheme of Delegation;
- **'DSL'** means the Designated Safeguarding Lead in each school, and **'deputy DSL'** means a trained member of staff who deputises for the DSL;
- **'family help'** means support for children and families provided by the school or other agencies to address emerging needs before they escalate (previously known as early help);
- **'LADO'** means the Local Authority Designated Officer, who is involved in the management and oversight of allegations against people who work with children;
- **'safeguarding partners'** means the local authority, the integrated care board and the chief officer of police, who together make the local safeguarding arrangements (in Worcestershire, the Worcestershire Safeguarding Children Partnership); and
- **'abuse', 'neglect' and 'exploitation'** have the meanings given in Part one of KCSIE 2026.

Pupils aged 18 or over remain entitled to support from the school. Where there are concerns about a pupil aged 18 or over, the DSL will follow adult safeguarding procedures and seek advice from Worcestershire adult social care where needed.

4 Legal framework

The Trust Board has a duty under section 175 of the Education Act 2002 and paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014 to make arrangements to safeguard and promote the welfare of children. This duty applies to academies through their funding agreements.

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

- Children Act 1989 and Children Act 2004
- Education Act 1996 and Education Act 2002, in particular section 175
- Education (Independent School Standards) Regulations 2014
- Education (Pupil Registration) (England) Regulations 2024
- Children and Families Act 2014
- Children's Wellbeing and Schools Act 2026
- Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018

- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015 (mandatory reporting duty)
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Counter-Terrorism and Security Act 2015 (the Prevent duty)
- Domestic Abuse Act 2021
- Equality Act 2010, including the Public Sector Equality Duty
- Human Rights Act 1998
- UK General Data Protection Regulation and Data Protection Act 2018
- DfE (2026) 'Keeping children safe in education'
- HM Government (2026) 'Working together to safeguard children'
- DfE 'Statutory framework for the early years foundation stage'
- Home Office 'Prevent duty guidance' and 'Channel duty guidance'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Multi-agency statutory guidance for dealing with forced marriage'
- DfE 'Working together to improve school attendance'
- DfE 'Children missing education'
- DfE 'Information sharing: advice for practitioners providing safeguarding services'
- DfE 'Filtering and monitoring standards for schools and colleges' and 'Cyber security standards for schools and colleges'
- DfE 'Mobile phones in schools'
- DfE 'Searching, screening and confiscation'
- DfE 'Use of reasonable force and other restrictive interventions'
- UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Academy trust governance guide'
- Worcestershire Safeguarding Children Partnership procedures and the Worcestershire Levels of Need (Thresholds) guidance

5 Roles and responsibilities

5.1 The Trust Board

The Trust Board is the proprietor of each academy and is accountable for safeguarding across the Trust. It may delegate functions to ASCs and to the CEO through the Scheme of Delegation, but it cannot delegate its accountability. The Trust Board will be responsible for:

- Making sure that the Trust and each school comply with their duties under legislation and have regard to KCSIE and Working Together to Safeguard Children.
- Approving this policy and making sure that each school has an effective Safeguarding and Child Protection Policy that meets the standards in Annex A.
- Appointing a trustee with lead responsibility for safeguarding (the Safeguarding Trustee).
- Making sure that there is a senior leader in each school appointed as DSL, with the status, authority, time, funding, training, resources and support to carry out the role, and that the role is set out in their job description.
- Making sure that safer recruitment practice is followed, that the Trust has procedures for managing allegations and low-level concerns, and that it meets its duty to refer to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA).
- Making sure that appropriate filtering and monitoring systems are in place across the Trust, that their effectiveness is reviewed at least annually, and that the Trust meets the DfE's filtering and monitoring and cyber security standards.
- Making sure that all trustees receive safeguarding and child protection training, including online safety, at induction and that it is regularly updated.

- Receiving an annual safeguarding report and using it, together with other evidence, to challenge and assure itself that safeguarding is effective in every school.
- Making sure that the Trust has regard to the Public Sector Equality Duty in its safeguarding arrangements, including for pupils with protected characteristics.

5.2 The Safeguarding Trustee

The Safeguarding Trustee will be responsible for:

- Leading the Trust Board's oversight of safeguarding and acting as the Board's link with the Trusts Safeguarding Lead.
- Meeting the Trust Safeguarding Lead at least termly to review Trust-wide safeguarding information, audit outcomes and emerging risks.
- Supporting ASC safeguarding link members and making sure that ASC monitoring is consistent across schools.
- Reporting to the Trust Board on the effectiveness of safeguarding across the Trust.

The Safeguarding Trustee does not manage individual cases.

5.3 Academy Standards Committees

Each ASC will be responsible for:

- Approving the school's Safeguarding and Child Protection Policy each year, where this is delegated by the Trust Board, and making sure that it meets the standards in Annex A.
- Appointing a safeguarding link member, who will meet the DSL at least termly and take part in the school's safeguarding audits.
- Receiving a safeguarding report from the headteacher or DSL each term, and challenging the school on the impact of its arrangements.
- Making sure that the single central record is checked at least termly by the headteacher and the DSL.
- Making sure that all ASC members receive safeguarding and child protection training, including online safety, at induction and that it is regularly updated.
- Reporting any significant safeguarding concern about the school's arrangements to the CEO and the Safeguarding Trustee.

5.4 The Chief Executive Officer

The CEO will be responsible for:

- The implementation of this policy across the Trust, and for holding headteachers to account for safeguarding in their schools.
- Acting as case manager for allegations about a headteacher, and making sure that allegations about staff are managed in line with Part four of KCSIE (see section 13 and Annex B).
- Making sure that the Trust's central functions, including HR, recruitment, IT and estates, support safe practice in schools.
- Being informed promptly of any serious safeguarding incident (see section 17) and deciding, with the headteacher, what further action or notification is needed.
- Making sure that the Trust Safeguarding Lead has the time and authority to carry out the role.

5.5 The Trust Safeguarding Lead

The Trust Safeguarding Lead is Sarah Anderson-Kirby. The Trust Safeguarding Lead will be responsible for:

- Advising the CEO and the Trust Board on safeguarding, and facilitating the annual Trust safeguarding report.
- Leading a network of DSLs across the Trust that meets at least termly to share practice, local intelligence, training and learning from reviews.
- Checking each year that each school's Safeguarding and Child Protection Policy meets the standards in Annex A and is published on the school's website.

- Co-ordinating the safeguarding audits and quality assurance activity, including peer review between schools, and following up actions.
- Supporting DSLs with complex cases and supporting cover arrangements when a school's DSL and deputies are unavailable.
- Keeping the Trust up to date with changes to national guidance and to Worcestershire arrangements.

The Trust Safeguarding Lead does not replace the DSL in each school, who keeps lead responsibility for safeguarding and child protection in that school.

5.6 Headteachers

Each headteacher will be responsible for:

- Making sure that this policy and the school's Safeguarding and Child Protection Policy are implemented and followed by all staff.
- Appointing a DSL from the senior leadership team and enough trained deputies to make sure that a DSL or deputy is always available during school hours and for out-of-hours activities.
- Making sure that all staff receive safeguarding induction and training in line with section 15, and that records are kept.
- Making sure that safer recruitment practice is followed and that the single central record is complete and accurate.
- Managing allegations and low-level concerns about staff (other than the headteacher) in line with section 13 and informing the CEO of any allegation that meets the harm threshold.
- Designating a member of the senior leadership team to be responsible for filtering and monitoring and making sure that the annual review takes place.
- Appointing a designated teacher for looked-after and previously looked-after children and a senior mental health lead.
- Reporting to the ASC each term and informing the CEO of serious safeguarding incidents.

5.7 Designated safeguarding leads and deputies

Each school's DSL takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems in place. The detailed responsibilities of the DSL are set out in Annex C of KCSIE and in each school's policy. Deputy DSLs are trained to the same standard as the DSL. Lead responsibility remains with the DSL and cannot be delegated.

5.8 All staff

All staff will be responsible for:

- Reading and following this policy, their school's Safeguarding and Child Protection Policy, the Staff Code of Conduct and Part one of KCSIE.
- Being alert to the signs of abuse, neglect and exploitation, and reporting any concern about a child to the DSL (or a deputy) immediately.
- Knowing the identity of the DSL and deputies in their school and how to contact them.
- Recording concerns accurately and promptly on the school's safeguarding system.
- Taking part in safeguarding training and keeping their knowledge up to date.
- Raising concerns about the conduct of other adults, including through the Trust's whistleblowing procedures.

Any member of staff can make a referral to children's social care or the police directly if they believe that a child is at immediate risk of significant harm. They should tell the DSL as soon as possible afterwards.

5.9 Central staff, contractors and visitors

Central staff who visit schools, work with pupils or have access to pupil data follow the safeguarding procedures of the school they are working in and report concerns to that school's DSL. Contractors, lettings

users and visitors must follow the safeguarding arrangements of the school they are visiting, including signing in and wearing identification.

6 A Trust-wide safeguarding culture

The Trust expects every school to have a culture in which safeguarding is part of everyday practice, not only a set of procedures. In every Trust school:

- children know which adults they can talk to, and are confident that they will be listened to and taken seriously;
- staff are professionally curious, and do not wait for a child to disclose before acting on a concern;
- children's wishes and feelings are sought, recorded and taken into account in decisions about them, and staff recognise that children may communicate through their behaviour;
- staff understand that children may not feel ready, or know how, to tell someone that they are being abused, exploited or neglected, and may not recognise their experiences as harmful;
- staff recognise that some children face additional barriers to telling someone, including children with special educational needs and disabilities (SEND), children with communication needs and children who have experienced discrimination; and
- adults feel able to raise concerns about the behaviour of colleagues and know that concerns will be handled fairly and confidentially.

Safeguarding is taught through a planned, age-appropriate curriculum, including relationships, sex and health education (RSE, RSHE), personal, social and health education (PSHE/PSD), computing and the wider life of each school. Each school's policy describes how this is done in that school.

7 Designated safeguarding lead arrangements

Every Trust school will make sure that:

- the DSL is a member of the senior leadership team, and the role is set out in the DSL's job description;
- there are enough trained deputy DSLs for the size and needs of the school;
- a DSL or deputy is available during school hours, in person wherever possible, to discuss concerns. In exceptional circumstances, availability may be by telephone or Microsoft Teams;
- there are clear, reliable cover arrangements, which all staff know about, for times when the DSL and deputies are not available, including holidays and out-of-hours activities. These may include a confidential shared safeguarding mailbox, access to the Trust Safeguarding Lead, or support from a trained DSL at another Trust school;
- the name and contact details of the DSL and deputies are displayed around the school, in the staff handbook and on the school website; and
- the DSL has time to carry out the role, including to attend child protection conferences, core groups and strategy meetings.

Where the headteacher is also the DSL, which is more likely in a smaller primary school, the school must have at least one trained deputy DSL. The ASC and the Trust Safeguarding Lead will check that the headteacher has enough time and support to do both roles.

8 Recognising, responding to and recording concerns

8.1 Responding to a concern or disclosure

If a child tells a member of staff about abuse, or a member of staff has a concern about a child, they will:

- listen calmly and take the child seriously, reassuring them that they have done the right thing;
- not promise confidentiality, but explain that they will need to share the information with people who can help;
- not ask leading questions or investigate;
- record what the child said, in the child's own words where possible, and what they observed, as soon as possible; and

- report the concern to the DSL or a deputy immediately.

8.2 Levels of need and referrals

All Trust schools use the Worcestershire Levels of Need (Thresholds) guidance to decide what help a child needs. The DSL will decide whether:

- the child's needs can be met through support in school;
- the child and family would benefit from family help, which may be led by the school or another agency; or
- a referral is needed to children's social care through the Worcestershire Family Front Door because the child is in need or is suffering or likely to suffer significant harm.

If a child is in immediate danger, staff will contact the police on 999 and inform the DSL. Referrals will not be delayed to gather more information or to consult parents where this could place the child at risk.

If, after a referral, the child's situation does not appear to be improving, the DSL will press for re-consideration and use the Worcestershire escalation procedure if needed.

8.3 Recording

All Trust schools record safeguarding concerns, discussions, decisions and actions on CPOMS. Records must be clear, factual, dated and signed, and must distinguish between fact and opinion. Each record should show the concern, the action taken, the reasons for any decision, and the outcome.

The DSL will review records regularly so that patterns of low-level concern are noticed and acted on.

8.4 Informing parents

Schools will normally discuss concerns with parents and seek their agreement to referrals. They will not do so where this could place the child at additional risk of harm, or where children's social care or the police advise against it. The DSL will record the reason for any decision not to inform parents.

9 Specific safeguarding issues

Staff must be aware of the specific safeguarding issues described in Part one and Annex B of KCSIE 2026. Each school's policy sets out how it responds to these issues.

9.1 Child-on-child abuse

Child-on-child abuse includes sexual violence, sexual harassment, harmful sexual behaviour, bullying, physical abuse, abuse in intimate relationships, initiation or hazing, and the making or sharing of nude and semi-nude images, will never be dismissed as 'banter', 'part of growing up' or 'boys being boys'. Schools will:

- challenge inappropriate behaviour, including misogynistic and prejudiced language and attitudes, at the earliest opportunity;
- respond to every report, support the child who has been harmed, and consider the needs of every child involved, including the child who has caused harm;
- use the NSPCC Hackett continuum, or another recognised tool, to help judge whether sexualised behaviour is developmentally expected, inappropriate, problematic or abusive;
- carry out and record a risk assessment where there is a report of sexual violence, and keep it under review; and
- follow the Trust's Behaviour and Anti-bullying policies alongside safeguarding procedures.

9.2 Nude and semi-nude images, including AI-generated images

All incidents of making or sharing nude and semi-nude images of children, including deepfakes and images created or altered using artificial intelligence (AI), will be treated as a safeguarding concern. Staff must not view, copy, print, forward or save such images. Schools will follow the UKCIS guidance 'Sharing nudes and semi-nudes'.

9.3 **Mental health, self-harm and suicide**

Mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff will treat concerns about self-harm, suicidal ideation or the risk of suicide as safeguarding concerns and report them to the DSL immediately. Where a child is in immediate danger, staff will call 999. Each school's DSL will work closely with its senior mental health lead.

9.4 **Exploitation and serious violence**

Schools will be alert to child criminal exploitation (including county lines), child sexual exploitation, financial exploitation, trafficking and modern slavery, and serious violence, including the carrying of weapons. Children who are exploited will be treated as victims, not as offenders. Where there are concerns about exploitation, the DSL will consider completing a Worcestershire Get Safe assessment and making a referral. Where there is a concern that a child may be carrying a weapon, staff will report it to the DSL immediately, and the school will involve the police where appropriate.

9.5 **Radicalisation and the Prevent duty**

Each school will have due regard to the need to prevent people from being drawn into terrorism. Staff will be trained to recognise children who may be susceptible to radicalisation and to report concerns to the DSL, who will consider a Prevent referral. Each school will assess the risk of radicalisation in its local area, and check the suitability of visiting speakers and of groups using its premises.

9.6 **Domestic abuse and Operation Encompass**

Children who see, hear or experience the effects of domestic abuse are victims in their own right. All Trust schools take part in Operation Encompass. The DSL will make sure that notifications are acted on before the start of the next school day where possible, and where appropriate, that the child receives appropriate support.

9.7 **Female genital mutilation, forced marriage and so-called honour-based abuse**

These are forms of child abuse. Teachers have a statutory duty to report to the police where they discover, in the course of their work, that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18. They should also inform the DSL. It is a criminal offence to cause a child to marry before the age of 18, in any circumstances.

9.8 **Prejudice-based harm**

Racism, faith-based prejudice, misogyny, homophobia and other forms of discrimination can cause serious harm. Staff will treat prejudice-based bullying and harassment as a safeguarding concern where it causes, or is likely to cause, harm.

10 **Children who may need additional help or protection**

Some children are more likely to experience harm, or face extra barriers to getting help. Every Trust school will identify these children, share information appropriately and review their support regularly. They include:

- **children with SEND or health conditions**, who may find it harder to communicate concerns, and for whom signs of abuse can be wrongly attributed to their needs. Schools will make sure that SEND and safeguarding staff work closely together;
- **looked-after and previously looked-after children**. Each school's designated teacher will work with the DSL, the child's social worker and the Virtual School;
- **children who have, or have had, a social worker**. Schools will share information about attendance, welfare and progress promptly with social workers and the Virtual School;
- **children who are absent from education**, particularly when this is repeated, prolonged or unexplained. Absence can be a sign of abuse, neglect or exploitation. Schools will hold at least two emergency contacts

for each child where reasonably possible, and will follow up absence in line with the Trust's Attendance Policy and the DfE's 'Working together to improve school attendance';

- **children missing education.** Schools will inform Worcestershire County Council when a child's name is to be removed from the admission register, including where parents choose elective home education;
- **children who are repeatedly removed from the classroom,** whose needs and circumstances will be reviewed by the DSL and pastoral staff;
- **young carers, privately fostered children and children in kinship care;**
- **children who are questioning their gender;**
- **children attending alternative provision;** and
- **children in the early years foundation stage.**

10.1 Children who are questioning their gender

Trust schools will follow the statutory guidance in KCSIE 2026 on children who are questioning their gender. Schools will not initiate social transition. Any request will be considered carefully and on an individual basis, taking account of the child's welfare and best interests. Parents will be involved in decisions except in the rare cases where involving them would put the child at significant risk of harm; any such decision will be taken by the DSL and recorded. Toilets, changing rooms and overnight accommodation will be provided on the basis of biological sex. Staff will respond to children with sensitivity and respect, and will be alert to any wider safeguarding concerns, including bullying and mental health.

10.2 Alternative provision

Where a Trust school places a child in alternative provision, the school remains responsible for the child's safeguarding. It will obtain written confirmation that the provider has carried out appropriate safeguarding checks on staff, know where the child is based during the school day, and check attendance and welfare regularly.

10.3 Early years

Trust primary schools with early years provision will also meet the safeguarding and welfare requirements of the EYFS statutory framework. This includes the requirement that staff must not begin work until an enhanced DBS certificate with barred list information has been received, and the requirements on the use of mobile phones and cameras in early years settings.

11 Online safety, filtering and monitoring

The Trust recognises that the online risks to children can be grouped into four categories: content, contact, conduct and commerce. These now include risks from generative AI, such as harmful interactions with AI tools and the creation of AI-generated abuse images.

The Trust Board is responsible for making sure that appropriate filtering and monitoring systems are in place in every school and that the Trust meets the DfE's filtering and monitoring standards and cyber security standards. To do this:

- each school will designate a member of its senior leadership team as responsible for filtering and monitoring, working with the DSL and the Trust's IT service provider;
- filtering and monitoring provision will be reviewed at least annually, and whenever there is a significant change or a new risk is identified. Reviews will check that systems work on every device that connects to the internet in every relevant location, and the results will be recorded;
- the DSL will take lead responsibility for acting on alerts and reports from monitoring systems;
- all staff will be trained to understand their role in relation to filtering and monitoring, and how to report concerns;
- any AI tools used by staff or pupils will be assessed for safeguarding and data protection risks before use; and
- the Safeguarding Trustee and each ASC will receive the outcome of the annual review.

All Trust schools will be mobile phone-free throughout the school day by default, in line with the DfE's guidance 'Mobile phones in schools'. Each school's Behaviour Policy sets out how this works in practice. Any exceptions will be agreed on an individual basis, for example for medical reasons.

12 Safer recruitment and the single central record

The Trust is committed to recruiting only people who are suitable to work with children. The Trust's Recruitment Policy sets out the detail. In every school and in the central team:

- at least one member of every recruitment panel will have completed safer recruitment training;
- job advertisements and application packs will include the Trust's commitment to safeguarding and state that online searches will be carried out;
- references will be obtained before interview wherever possible, and will be scrutinised and followed up;
- online searches will be carried out on shortlisted candidates as part of due diligence;
- all pre-appointment checks required by Part three of KCSIE will be completed and recorded before a person starts work, including an enhanced DBS check with barred list information for anyone in regulated activity, and prohibition checks for teaching roles;
- volunteers in regulated activity will have an enhanced DBS check with barred list information. In line with KCSIE 2026, this applies whether or not they are supervised. Other volunteers will be risk assessed;
- written confirmation of checks will be obtained for supply and agency staff, and for trainee teachers from their provider; and
- contractors will have checks that are appropriate to the work they do and the access they will have to children.

Each school keeps its own single central record (SCR). The Trust keeps an SCR for central staff, trustees and members. Each school's SCR will be checked at least termly by the headteacher and the ASC safeguarding link member, and audited at least annually by the Trust. Any gaps found will be put right straight away.

13 Allegations and concerns about adults

The Trust takes all concerns about the conduct of adults seriously. Allegations and concerns will be managed in line with Part four of KCSIE 2026 and Worcestershire LADO procedures.

13.1 Allegations that may meet the harm threshold

An allegation meets the harm threshold if it is alleged that an adult working in or on behalf of the Trust 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 they 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.
- This includes behaviour outside work.

Such allegations must be reported without delay to the case manager set out in Annex B, who will discuss them with the LADO, normally within one working day. The case manager must not investigate before speaking to the LADO. The Trust will follow the LADO's advice, consider whether suspension is necessary, support the person subject to the allegation, and keep all parties informed as appropriate. The CEO will always be informed of any allegation made against a member of staff that is referred to the LADO.

Allegations about supply or agency staff, contractors and trainee teachers will be managed in the same way, working with the employing organisation.

13.2 Low-level concerns

A low-level concern is any concern, no matter how small, that an adult may have acted in a way that is inconsistent with the Staff Code of Conduct, including outside work, but that does not meet the harm threshold. Examples include being over-friendly with children, having favourites, or using inappropriate language. Low-level concerns will be reported to the headteacher (or, for a concern about the headteacher,

to the CEO), recorded confidentially and reviewed so that patterns can be identified. Headteachers will share any pattern of concern with the CEO.

13.3 Referrals and whistleblowing

The Trust will refer anyone to the DBS where it removes them from regulated activity, or would have done so had they not left, because they have harmed a child or posed a risk of harm. It will consider a referral to the Teaching Regulation Agency where a teacher's conduct may lead to a prohibition order.

Staff who are worried about safeguarding practice in a school or in the Trust should raise concerns under the Trust's Whistleblowing Policy. Where they feel unable to do so, they can use the NSPCC Whistleblowing Advice Line on 0800 028 0285.

14 Information sharing, records and confidentiality

Sharing information is essential to keep children safe. Data protection law does not prevent, or limit, the sharing of information to keep children safe. Staff must never promise a child that they will keep a secret.

Safeguarding information will be shared on a need-to-know basis, in line with the DfE's information sharing advice and the Trust's Data Protection Policy. The DSL will record who information is shared with and why.

Every Trust school will make sure that:

- child protection records are kept securely on CPOMS, separate from the main pupil record, with access limited to those who need it;
- when a child moves to another school, the DSL transfers the child protection file to the new school's DSL securely and separately from the main pupil file, within five school days for a move during the school year, or within the first five school days of the new term otherwise, and obtains confirmation of receipt. For moves between Trust schools, including from Trust primary schools to Hanley Castle High School, the DSLs will also speak directly about any child with significant needs;
- information that a child may pose a risk to themselves or others is shared with the receiving school, so that it can plan to keep the child and others safe;
- safeguarding records are kept in line with the Trust's Records Management and Retention Policy. The last school a child attends keeps the child protection file until the child's 25th birthday, or longer where required; and
- requests for safeguarding information, including subject access requests and requests from the police, are referred to the DSL and the Trust's Data Protection Officer before any information is released.

The Children's Wellbeing and Schools Act 2026 introduces new duties on information sharing between agencies and a consistent identifier for each child. The Trust will update this policy and its procedures as these duties come into force.

15 Training and development

The Trust will make sure that everyone receives safeguarding training that is appropriate to their role. Each school will keep a record of the training completed by its staff, and the Trust will keep a record for trustees and central staff. The minimum expectations are as follows.

Group	Requirement	Frequency
All staff (including central staff who work with children)	Induction covering this policy, the school's Safeguarding and Child Protection Policy, the Behaviour Policy, the Staff Code of Conduct, the role and identity of the DSL, and arrangements for children absent from education. Whole-staff safeguarding and child protection training, including online safety and filtering and monitoring.	At induction, and full training updated at least every year. Briefings and updates throughout the year.
Volunteers and temporary staff	Induction proportionate to their role, including who to report concerns to.	Before starting

Group	Requirement	Frequency
DSL and deputy DSLs	Worcestershire DSL training, including Prevent awareness, and inter-agency working.	Every two years, with knowledge refreshed at least annually through the Trust DSL network and local updates
Trustees and ASC members	Safeguarding and child protection training, including online safety, so that they can provide strategic challenge.	At induction, and updated regularly
Recruitment panels	Safer recruitment training for at least one panel member.	Refreshed at least every three years
Headteachers and the CEO	Managing allegations against staff, and responsibilities under Part four of KCSIE.	On appointment, and refreshed at least every three years
Designated teachers and senior mental health leads	Training specific to the role.	On appointment, and updated regularly

All staff will also receive regular safeguarding updates, including local contextual safeguarding information, through staff briefings, bulletins and meetings.

16 Working with parents, carers and partners

The Trust recognises that parents play the most important part in keeping their children safe. Each school will:

- make its Safeguarding and Child Protection Policy, and this policy, available on its website and on request;
- make sure that parents understand the school's responsibility to share concerns with other agencies, including where this is done without their agreement;
- help parents to keep their children safe, including online, and signpost them to family help and other support; and
- hold at least two emergency contacts for every child, where reasonably possible.

Education has an important role in local safeguarding arrangements. All Trust schools work with the Worcestershire Safeguarding Children Partnership and follow its procedures. Schools will contribute to multi-agency assessments, plans and meetings, and share information with other agencies promptly.

17 Trust assurance, monitoring and reporting

The Trust Board needs to know that safeguarding is effective in every school. The Trust will gain assurance through the following cycle.

Activity	Detail	Frequency and reporting
DSL report to ASC	Number and type of concerns and referrals, children with a social worker, child-on-child abuse, online safety incidents, training, SCR checks and emerging issues. No child should be identifiable.	Termly, to the ASC
Trust DSL network	Led by the Trust Safeguarding Lead. Sharing practice, local intelligence, learning from reviews and national updates.	At least termly
Annual safeguarding audit	Each school completes the Worcestershire annual safeguarding audit (section 175/157 audit), with its ASC safeguarding link member, and shares it with the Trust Safeguarding Lead.	Annually, to the ASC and the Trust
SCR audit	Check that all required checks are complete and recorded correctly.	Termly by the school; annually by the Trust
Filtering and monitoring review	Review of filtering and monitoring provision in line with DfE standards.	Annually, to the ASC and the Safeguarding Trustee
Policy check	Check that each school policy meets Annex A, is up to date and is published.	Annually, by the Trust Safeguarding Lead
Quality assurance visits and peer review	Visits by the Trust Safeguarding Lead, and peer review between Trust DSLs, including case file sampling and speaking to pupils and staff.	At least annually for each school

Activity	Detail	Frequency and reporting
Trust safeguarding report	Summary of findings across the Trust, with actions.	Termly, to the Trust Board

17.1 Serious incidents

Headteachers will inform the CEO and the Trust Safeguarding Lead on the same day of any serious safeguarding incident. This includes:

- an allegation against a member of staff that is referred to the LADO;
- a serious incident involving a child on the school site or on a school activity, including where the police are called;
- the death or serious injury of a child where abuse or neglect is known or suspected;
- the involvement of the school in a local or national child safeguarding practice review; and
- any safeguarding matter likely to attract media interest.

The CEO will decide whether the Trust Board, the DfE, the Trust's insurer or any other body should be informed. Learning from serious incidents and reviews will be shared across the Trust.

18 Complaints

Concerns about how a school has handled a safeguarding matter should first be raised with the headteacher. Formal complaints will be handled under the HUET Complaints Policy. A complaint will not delay any action needed to keep a child safe. Complaints about the conduct of a member of staff that suggest a child may have been harmed will be managed as an allegation under section 13.

19 Monitoring and review

This policy will be reviewed annually by the Trust Board, following the publication of each year's KCSIE. It will be reviewed sooner if legislation or statutory guidance changes, or if a review or incident shows that it needs to change.

Each school's Safeguarding and Child Protection Policy will be reviewed and approved annually, and published on the school's website.

20 Links with other policies

This policy operates in conjunction with the following policies and documents:

- Each school's Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Recruitment Policy (safer recruitment)
- Behaviour Policy, including mobile phones
- Anti-bullying Policy
- Online Safety and Acceptable Use policies
- Attendance Policy
- Special Educational Needs and Disabilities (SEND) Policy
- Supporting Pupils with Medical Conditions Policy
- Intimate Care Policy
- Relationships and Sex Education Policy
- Educational Visits Policy
- Health and Safety Policy
- Data Protection Policy and Records Management and Retention Policy
- Equalities Policy
- Complaints Policy
- Lettings Policy

21 Annex A – Minimum content of school safeguarding policies

Each school's Safeguarding and Child Protection Policy must include the following. The Trust Safeguarding Lead will use this checklist when checking school policies each year. Status key: Yes = included and up to date; Partial = included but needs updating; No = not included.

Requirement	HCHS	Hanley Swan	Kempsey	Welland
Policy information				
Statement that the policy is to be read alongside the Trust Safeguarding Policy				
Date of approval by the ASC, and date of next review (at least annual)				
References to KCSIE 2026 and Working Together to Safeguard Children 2026				
No template wording or placeholders left in the published version				
Key people and contacts				
Names and contact details of the DSL and all deputies				
Headteacher, chair of the ASC and ASC safeguarding link member				
Designated teacher, senior mental health lead and online safety lead				
SLT member responsible for filtering and monitoring				
Trust Safeguarding Lead, CEO and Safeguarding Trustee				
Worcestershire Family Front Door (in and out of hours) and LADO				
Procedures				
How staff report and record concerns (CPOMS), and what to do if the DSL is unavailable				
DSL cover arrangements, including out-of-hours activities				
Use of the Worcestershire Levels of Need guidance, and escalation				
Informing parents, and when not to				
Allegations and low-level concerns procedures consistent with Annex B				
Transfer of child protection files, including to Trust schools				
Specific issues				
Child-on-child abuse, including sexual violence and harassment and harmful sexual behaviour				
Nude and semi-nude images, including AI-generated images				
Mental health, self-harm and suicide				
Exploitation (CCE, CSE, county lines), serious violence and modern slavery				
Prevent duty and local risk assessment				
Domestic abuse and Operation Encompass				

Requirement	HCHS	Hanley Swan	Kempsey	Welland
FGM (mandatory reporting), forced marriage and honour-based abuse				
Children absent from education and children missing education				
SEND, looked-after children and children with a social worker				
Children who are questioning their gender, consistent with section 10				
Online safety, filtering and monitoring, AI and mobile phones				
Alternative provision, educational visits, homestays and lettings				
Early years (primary schools with EYFS provision only)				
Pupils aged 16 to 18 and over (Hanley Castle High School only)				
Safer working				
Safer recruitment, the SCR, volunteers and contractors				
Visitors, site security and identification				
Staff Code of Conduct, reasonable force and intimate care				
Training for staff, the DSL team and ASC members				
Curriculum				
How safeguarding, including online safety and healthy relationships, is taught				

22 Annex B – Who to tell about allegations and concerns about adults

In all cases, if a child is in immediate danger, contact the police on 999. If you are unsure, speak to the LADO for advice. If you cannot raise a concern with the person named below, or you are worried that it has not been dealt with, use the Trust's Whistleblowing Policy or contact the LADO directly.

If the concern is about...	Report it to...	Who then...
A member of staff, supply or agency worker, volunteer, contractor or trainee teacher in a school	The headteacher	Discusses it with the LADO where it may meet the harm threshold, and informs the CEO
The headteacher	The CEO	Discusses it with the LADO, and informs the Chair of Trustees
A member of the Trust's central team	The CEO	Discusses it with the LADO where it may meet the harm threshold
The CEO	The Chair of Trustees	Discusses it with the LADO, and informs the Safeguarding Trustee
A trustee or ASC member	The CEO and the Chair of Trustees (or the Vice-Chair, if the concern is about the Chair)	Discuss it with the LADO where it may meet the harm threshold
A low-level concern about any adult	The headteacher, or the CEO for concerns about a headteacher or central staff	Record it confidentially and review it for patterns

23 Annex C – Key contacts

School DSL details are correct at the date of this policy. Each school's policy holds the current details of its safeguarding team.

Role	Name	Contact
Chief Executive Officer	Mark Stow	01684 593241
Chair of Trustees	Tim Sinden	01684 593241
Safeguarding Trustee	Kate Taylor	01684 593241
Trust Safeguarding Lead	Sarah Anderson-Kirby	01684 593241
Trust Data Protection Officer	Rob Johnston	01684 593241
DSL, Hanley Castle High School	Sarah Anderson-Kirby	andersonkirbys@hanleycastlehs.org.uk / 01684 593241
DSL, Hanley Swan Primary School	Paul Bundy	head@hanleyswanps.org.uk / 01684 310364
DSL, Kempsey Primary School	Bryony Baynes	bbaynes@kempseyps.org.uk / 01905 820262
DSL, Welland Primary School	Gareth Williams	head@wellandps.org.uk / 01684 310246
Worcestershire Family Front Door		01905 822666 (core working hours)
Out of hours (Emergency Duty Team)		01905 768020
Worcestershire LADO		01905 846221.
West Mercia Police		999 (emergency) / 101 (non-emergency)
NSPCC Whistleblowing Advice Line		0800 028 0285
Forced Marriage Unit		020 7008 0151