

Overarching Safeguarding Policy

Applies to	The Harpur Trust
Endorsed by	David Steadman
Responsibility	Board of Trustees
Date reviewed	January 2025
Next review	January 2026

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1. Policy statement

- 1 Trustees, School Governing Body members, senior leadership teams and staff of The Harpur Trust are fully committed to the rigorous implementation of safeguarding procedures and practices 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 harm. Trustees regard this as a key governance priority.
- 2 The Harpur Trust operates four independent schools, which educate a large number of young people. Therefore, in particular, the Trustees, governance committees and staff of the Trust will provide help and support to meet the needs of children as soon as problems emerge, protecting of children and young people in their care from maltreatment whether that is within or outside the home, including online, preventing impairment of physical and mental 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, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.
- 3 The Harpur Trust also supports the local community by giving grants to local projects, through social investments, community events and programmes including Bedford Giving and The Accelerator Programme that work with external delivery partners and school staff.

2. Policy intention

4. The purpose of this policy is:
 - 4.1. to provide Trustees, School Governing Bodies, senior leadership teams, staff and volunteers with the overarching legal framework and principles that guide our approach to safeguarding.
 - 4.2. to outline the statutory responsibilities of Trustees, School Governing Body members and senior leadership teams, Harpur Trust Office staff and the mechanisms for monitoring compliance in our schools and other activities.

3. Legal and policy framework

5. This policy has been drawn up on the basis of law and guidance that seeks to protect children (everyone under the age of 18), other beneficiaries, and others the charity comes into contact with, namely:
 - 5.1. Charity Commission guidance on safeguarding for charities and trustees, Nov 2021
 - 5.2. The Education Act, 2002
 - 5.3. Keeping Children Safe in Education, Department for Education, September 2023 2024
 - 5.4. Working Together to Safeguard Children, Department for Education, July December 2023
 - 5.5. Working together to Improve School Attendance August 2024
 - 5.6. Statutory framework for the Early Years Foundation Stage, Department for Education, January 2024
 - 5.7. Statutory guidance for Relationships and Sex Education (RSE) and Health Education, Department for Education,

- 5.8. National Minimum Standards for boarding schools, Department for Education, September 2022
 - 5.9. Guidance for Information Sharing for Safeguarding Practitioners, Department for Education, July 2023
 - 5.10. Strategy for dealing with safeguarding issues in charities, Charity Commission, December 2017
 - 5.11. Prevent Duty Guidance: England and Wales 2023
6. This policy refers to and should be read in conjunction with the following Harpur Trust policies: Whistleblowing, Disclosure and Barring Service (DBS) Disclosure, Recruitment and Selection, Reporting of Serious Incidents, Dignity at Work, Health & Safety, First Aid, Digital Safety, Welfare, Complaints, Bullying and Harassment as well as the individual Safeguarding and Child Protection policies at each of the Trust's schools.

4. Responsibilities

- 7. Charity Commission guidance on safeguarding for charities and trustees states that all charities have a responsibility to ensure they do not cause harm to anyone who has contact with them. Charities working with children at risk have extra responsibilities.
- 8. Trustees must individually and collectively make sure that their charity fulfils this responsibility. Even if they delegate some activities to a safeguarding lead or group, they retain overall responsibility.
- 9. All Trustees are therefore responsible for ensuring safeguarding is well managed within all areas of The Trust including each of the Trust's schools.
- 10. The Board delegates oversight of safeguarding within each school to the relevant School Governing Body, within the Harpur Trust Office to the Schools Committee, and in the grants and other community programmes to the Community Committee.
- 11. Trustees discharge their responsibilities by understanding the safeguarding governance and management arrangements at The Trust in its schools and through its community programmes, including this policy, understanding the relevant guidance, and assuring themselves regularly that the arrangements are working effectively.
- 12. A Trustee with appropriate skills and experience or training will be appointed to have particular responsibility for oversight of safeguarding as Nominated Safeguarding Trustee. This Trustee will be a member of the Schools Committee and a point of contact for Nominated Safeguarding Governors, alongside the Chief Executive.
- 13. Trustees, School Governing Body members and senior leadership teams have a statutory duty to read and follow government guidance published in Keeping Children Safe in Education and Working Together to Safeguard Children.
- 14. Trustees, members of School Governing Bodies and senior leadership teams should read the Charity Commission Strategy for dealing with safeguarding issues, and the Trust's Policy on Reporting Serious Incidents.
- 15. Whilst Trustees and School Governing Body members do not become involved in the operational management of safeguarding, School Governing Bodies are accountable to the Board for ensuring that safeguarding arrangements at the Trust's schools are effective and must ensure that the schools comply with their duties around safeguarding under legislation and always comply with the law.
- 16. Independent schools also have a statutory duty under section 157 of the Education Act 2002 to safeguard and promote the welfare of all children.

17. Each School Governing Body appoints a Nominated Safeguarding Governor (NSG) to have specific responsibility for oversight of the safeguarding regime as it applies to children in that school. **Appendix 1** provides a description of the duties of the Nominated Safeguarding Governor.
18. A senior member of staff from each of Trust's schools is appointed to the role of the Designated Safeguarding Lead (DSL). The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection at the school.
19. The DSL is the primary contact of the Nominated Safeguarding Governor on safeguarding matters for each school.
20. Schools may also choose to appoint additional staff with specific safeguarding responsibilities, such as Deputy Designated Safeguarding Leads (DDSL). Any such staff will require an equivalent standard of training to the lead DSL. Details of additional DSLs (Designated Safeguarding Leads) and deputies are included in each school's individual Safeguarding and Child Protection Policy.
21. As the role of the designated safeguarding lead carries a significant level of responsibility, the schools must ensure that DSLs have the appropriate status, authority, ~~ongoing training~~, continued professional development (CPD), resources and support within the school to carry out the duties of 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 contributing to the assessment of children.
22. Trustees are also accountable for safeguarding through The Trust's other activities. The Board has delegated to the Community Committee, responsibility for the governance of the community programmes, including the grants programme, any Almshouse accommodation, Bedford Giving and The Accelerator Programme. The Community Committee will assure the Board of compliance with safeguarding policy, law and regulations by reporting annually on all community safeguarding matters, including Almshouses.
23. Responsibility for the management of safeguarding within the Harpur Trust Office is delegated to the Chief Executive, with support from the Head of Education Partnerships, following Charity Commission guidance on Safeguarding and protecting people for charities and trustees¹
24. The Community Programmes Director is accountable for ensuring that proper due diligence is carried out on delivery partners and organisations funded by the Trust, to ensure that any grant recipient or partner body is suitable and has appropriate safeguarding procedures in place. This includes partners of Bedford Giving and The Accelerator Programme and is built into the contract of external partners where appropriate.
25. A directory of the key staff, Trustees and School Governing Body members referenced in this policy is at **Appendix 2**. Where individuals change, the Head of Education Partnerships may update the directory without seeking approval from the Board.

5. Safeguarding principles

26. 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 trust wide ethos that incorporates a comprehensive approach that aims to minimise risks to children's development and life chances by protecting them from potential

¹ <https://www.gov.uk/guidance/safeguarding-dues-for-charity-trustees> accessed 5/1/24

sources of harm and extending those principles as appropriate to all beneficiaries and others with whom the charity comes into contact.

27. 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.

28. We are committed to:

a **a child-centred approach.** We recognise a child's welfare is paramount. Staff must consider at all times, what is in the best interests of the child. Children are listened to and involved in decision-making and the development of safeguarding practices in line with the Human Rights Act 1998

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 through a professional curiosity to share and promote good practice across and beyond the Trust.

6. Safeguarding policies

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

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 PREVENT, Child-on-Child abuse, online safety, special education needs and disabilities, and serious violence. Procedures must be in accordance with government guidance, the local safeguarding partners and relevant agencies.

b **An attendance policy** providing guidance on procedures and reporting systems in relation to children who are persistently absent from school or who have unexplainable absences,

c **A behaviour policy**, reflecting measures to prevent bullying including cyberbullying, prejudice-based and discriminatory bullying.

d **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.

e Child protection policies should reflect the fact that some groups of children are potentially at greater risk of harm than others due to additional barriers

including, but not limited to, those who need a social worker, are missing from education, are in elective

f home education, require mental health support, are looked after, have special education needs and disabilities or physical health issues, are gender questioning or are LGBTQ+.

g **Appendix 3** presents guidance on the specific safeguarding issues that should be included in each of the Trust's individual school policies.

h Guidance and procedures on safeguarding issues are also contained in grant making policies and policies relating to the Trust's interests in Almshouse activities.

i All organizational and individual applicants to the Grants Programme must share details of their safeguarding practices as per the Safeguarding Compliance Checklist for Grant Applicants (Appendix 7). 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.

7. Information Sharing

30. Information regarding safeguarding matters about children in the Trust's care should be shared effectively, and at the earliest possible appropriate time.

31. 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.

32. All schools will have arrangements in place that clearly sets out the processes and principles for sharing information internally, inter-agency working and sharing information with other organisations and practitioners, in the best interest of the child. Detailed records will be kept about information shared, and reasons for sharing it.

8. Training

33. The Harpur Trust recognises the importance of continued professional development /training in enabling Trustees, School Committee members, relevant committee members and Senior Leadership Teams to be confident in discharging their duties and responsibilities for safeguarding and promoting the welfare of children who are pupils in the Trust's schools and other beneficiaries.

34. At induction, it is mandatory for Trustees and members of committees with delegated responsibility for safeguarding governance, particularly School Governing Body members, Schools Committee, Audit Committee and Community Committee members, to participate in appropriate safeguarding training, with a refresher training at least once every three years.

35. 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 their regular briefings with the DSLs, and through regular meetings of the Nominated Safeguarding Governors.

36. In each of the Trust's schools, the DSLs will ensure that all members of staff at the school undergo safeguarding and child protection training at induction, including online safety, and in line with any advice from Bedford Borough Safeguarding Children Board. Staff will receive regular safeguarding updates at least annually.

37. The Chief Executive will ensure that all Harpur Trust Office staff undergo safeguarding and child protection training at induction, and annual safeguarding training including completing the current Keeping Children Safe in Education PART 1 module annually and the Cyber Security Awareness module.

9. Online safety

38. To help safeguard children from potentially harmful and inappropriate online material, cyber security, appropriate filters and monitoring systems should be in place in each of the schools that sit within the Trust.

39. Guidance for operating online is found in the Social Media Policy, Staff Code of Conduct, Business and Communications Policy, individual school's safeguarding policies and IT Policy.

10. Opportunities to teach safeguarding

40. The curriculum in each of the Trust's schools should be tailored appropriately to promote safeguarding and teach all pupils how to keep themselves and others safe, how to protect themselves from harm, including the safe use of the internet. Schools must have regard to the statutory guidance around teaching Relationships and Sex Education and health education, alongside a preventative education approach to teach pupils across the Trust the skills they need for optimum life chances and prepare them for life in modern Britain.

11. Safer recruitment

41. 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 Selection and Disclosure policy and procedures that comply with current national and professional safer recruitment guidance. School Governing Bodies have a duty to assure themselves of compliance, as do Trustees who gain assurance via the Schools Committee

12. Allegations

42. The Trust promote a culture in which all concerns about adults are dealt with appropriately. Staff within the Trust should give regard to the Trust's Grievance, and Whistleblowing Policies, plus Staff Code of Conduct policies.

43. Each school in the Trust should have clear policies and procedures for dealing with allegations against staff in place and refer cases to the relevant authorities, accordingly, including Low Level concerns.

44. Allegations of abuse against any member of staff at one of the Trust's schools, including supply teachers, volunteers and contractors, must be reported to the Head teacher at the school.

45. Allegations against a Head Teacher at a school in the Trust must be reported to the Chair of the School Governing Body and the Link Governor.

46. The Trust recognises that children are capable of abusing their peers (child on child abuse). The Trust follows the principle that all child-on-child abuse is unacceptable and will not be tolerated. Individual school's Child Protection Policy should include clear procedures which set out how the risk of child-on-child abuse, including Sexual Violence and Sexual Harassment, will be minimised and how any allegations will be investigated and dealt with at each school.

47. Where there is a safeguarding concern, school leaders and School Governing Body members should ensure that all systems, processes and policies operate with the best interest of the child.

13. Assurance and monitoring of compliance

48. Although the Board and School Governing Bodies cannot be involved in the operational management of safeguarding, they are assured of effective management through regular scrutiny and the receipt of monitoring reports highlighting issues and trends.

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

50. Informed by the school's Designated Safeguarding Lead, the Nominated Safeguarding Governor will report at least termly to the School Governing Body, using the Termly Safeguarding report to the School Governing Body (**Appendix 4**), to enable the School Governing Body to consider any key issues, exceptions, trends and opportunities, and to ensure the effectiveness of the school's safeguarding processes.

51. On behalf of the Board, the Schools Committee will review an annual safeguarding report, informed by the School Governing Body reports, to assess any key issues, exceptions, trends and opportunities across the Trust, to ensure the effectiveness of the Trust's overall safeguarding processes in its schools. The Schools Committee will be asked to decide annually that it is assured that governance of safeguarding is working effectively in its schools.

52. The Community Committee will also review safeguarding within the community programmes area annually and will be asked to decide that it is assured that governance of safeguarding is working effectively in the community programmes. Grant applicants will be asked to fill in the Safeguarding compliance checklist at Appendix 7.

53. To evidence appropriate assurance, School Governing Bodies, Schools Committee, Community Committee 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.

54. The Chair of the School Governing Body 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.

14. Annual review of safeguarding

55. The schools' Designated Safeguarding Leads in partnership with the Nominated Safeguarding Governors are responsible for ensuring that the respective school's safeguarding/child protection policy is reviewed annually in line with this policy, and that procedures and implementation are reviewed and updated regularly if required.

56. The Board of Trustees will conduct an annual review of safeguarding, to assure itself of Trust's overall safeguarding processes; that policies are compliant with current law and best practice and are adhered to; prompt and appropriate action is taken where concerns are identified; and proper records are being kept.

57. The Board annual review will be informed and preceded by annual reviews of safeguarding at each School Governing Body, to support an annual review of school safeguarding at the Schools Committee; and an annual review of community programmes safeguarding by the Community Committee. The Board will review and be

asked to confirm that it is assured that safeguarding is working effectively within the Trust.

58. The annual review of safeguarding in the school should be carried out in line with the terms of reference at Appendix 6, and the report to the School Governing Body should be in line with the template at Appendix 5, including the Safeguarding Compliance Checklist.

15. Charity Commission Serious Incident Reports

59. As a charity, the Harpur Trust has a statutory duty to report serious incidents.

60. 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
- damage to a charity's property
- harm to a charity's work or reputation

61. Should a serious safeguarding incident occur, then a Serious Incident Report to the Charity Commission will be considered in accordance with the Trust's Reporting Serious Incident Policy and Charity Commission guidance on charity and trustee duties to safeguard children.

16. Policy approval and review

62. 65. This Policy and any changes to it will be approved by the Board. It will be reviewed at least annually.

Approved by



Rhian Castell

Chair of the Harpur Trust

Controlled Document Template:

Date of Review	Amendment/Reason for Review	Authorised By
18.1.25	Changes to definition of safeguarding and other changes in KCSIE 2024. Amendment of forms and description of the annual safeguarding review to take account of the new governance structure.	
18.01.2024	Policy amended to reflect routine updates that are made to the safeguarding policy each year in line with changes to statutory guidance, this policy has been significantly redrafted compared to previous versions to reduce duplication and overlap between school policies and the overarching Trust policy.	Board Meeting 18.01.2024

Linked to:

HTO library

Every Policy Document System HR shared drive iTrent:

Experience template & Company News Policies (HTO)

Trustee document library

Appendices below:

- 1.Nominated Safeguarding Governor – Description of Responsibilities
2. Harpur Trust safeguarding directory.
- 3.Guidance on specific safeguarding issues to be included in respective school and Trust policies.
- 4 Termly Safeguarding report to School Governing Body
- 5 Annual Safeguarding report to School Governing Body and the Trust
- 6.Annual Review of Safeguarding in the school – terms of reference
- 7.Safeguarding Compliance Checklist for Grant Applicants

17. Appendix 1 - Nominated Safeguarding Governor (NSG) – Description of Responsibilities

Summary of the role

1. Ensuring that Safeguarding is well-managed is the collective responsibility of the Trustees and School Governing Body members. To ensure that their obligations are discharged efficiently, each of the Harpur Trust's School Governing Bodies will nominate a governor with appropriate skills and experience or training 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'.

2. The NSG 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 NSG and DSL to meet at least once a term and whenever required to liaise on specific issues.

5. The NSG will also liaise with counterpart NSGs in other Harpur Trust schools, to share learning, trends, concerns and best practice, and with the Nominated Safeguarding Trustee if they have concerns that they believe should be escalated to the Board of Trustees.

Purpose of the Role

5. The primary purpose of the NSG role is to ensure that the outcomes for children are met and the school is safe.

6. The NSG 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 NSG is not to manage safeguarding within the school but to ensure that it is being properly managed.

Specific duties and responsibilities

8. NSGs 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;
- 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 (Human Resources) 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) 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 NSG, together with an outline of duties, will be publicised widely within the school community to ensure that pupils, parents, staff and School Governing Bodies 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 Integrated Front Door (previously MASH) 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 authority, whilst preserving strict confidentiality for the individuals involved (Appendix 3);
 - iii. work with the DSL to prepare an annual safeguarding report (to be reviewed by the School Governing body and then sent to the Schools Committee following the Autumn term SGB 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, trends, concerns 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 5;
 - 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 Governing Body and Schools 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. Should a serious safeguarding incident occur, then a Serious Incident Report to the Charity Commission should be considered in accordance with the Harpur Trust's Reporting Serious Incidents Policy and Charity Commission guidance on charity and trustee duties to safeguard children.
10. NSGs and DSLs should ensure they have read and understood the Harpur Trust Reporting Serious Incidents 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 NSG should attend appropriate training and keep up-to-date and well-informed about safeguarding legislation and guidance.
12. The NSG may seek advice and guidance from other Nominated Safeguarding Governors, the Head, Chief Executive, the Nominated Safeguarding Trustee or the Head Of Education Partnerships. If they are in any doubt whatsoever about any matter, they should also discuss it with the Chair of the School Governing Body Committee.

18. Appendix 2 – Harpur Trust safeguarding directory

Contact details for each individual are in the governance directory or are available from the EA to the Chief Executive

Nominated Safeguarding Governors at the Trust's Schools are:

- Harriet Mather: Pilgrims Pre-Preparatory School
- Andrew Edwards: Bedford School
- Toni Munno: Bedford Modern School
- Elizabeth Gray Bedford Girls School

Appointed DSLs at the Trust's schools are:

- Tracey Marquand: Pilgrims Pre-Preparatory School
- Rachel Mellor & Rachel Stratton: Bedford School
- Jude Goodacre & Jonathon Bungard: Bedford Modern School
- Kamelia Johnson & Carolyn Howe: Bedford Girls School

DDSLs at the Trust's schools are:

- Pilgrim Pre-Preparatory School – Justyna Kuzio
- Bedford School – Simon Lincoln, Sam Baldock, James Marriot, Alice Swallow & Simon Everitt
- Bedford Modern School – Andrew Whomsley, Paula Pacyna & Kate Harpin, Laura Coltman, Paul Renholds & Emma Harbour
- Bedford Girls School – Carolyn Howe, Gemma Gibson, Helen Woolley & Matt Gracie

Harpur Trust Safeguarding Trustee

- David Pye

The key contacts at the Harpur Trust Office are:

- Chief Executive – David Steadman
- Head of Education Partnerships – Caroline Downing
- Community Programmes Director – Lucy Bardner

Additional Key Contacts:

Bedford Integrated Front Door (BIFD, formerly known as MASH) Bedford Borough Council	Tel: 01234718700. Out of hours: 0300 300 8123 . Multiagency@bedford.gov.uk
Local Authority Designated Officer (LADO)	Sandeep Mohan Tel: 01234 276693 lado@bedford.gcsx.gov.uk
Bedfordshire Police	Tel: 01234 841212 or dial 101 for non-emergency calls. For emergencies, dial 999, or 112 from a mobile.
Bedfordshire Police Education and Diversion Local linked Officer	Dan Sullivan Tel: 01234 842709 Daniel.Sullivan@beds.police.uk

19. Appendix 3 – Guidance on specific safeguarding issues to be included in school and Trust policies

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
- ✓ Homelessness
- ✓ Mental Health
- ✓ Information Sharing (internal and 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
- ✓ Making 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

- ✓ Business and Communication
- ✓ Grievance and disciplinary
- ✓ Health and Safety
- ✓ IT Policy
- ✓ Recruitment, Selection and Disclosure
- ✓ Social Media
- ✓ Whistleblowing

further information about specific safeguarding issues, refer to *Keeping Children Safe in Education (2024)*, Annex B.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.

20. Appendix 4 - Termly safeguarding report to the School Governing Body

Termly Safeguarding report to the School Governing Body

School:

Year: 2024-2025

Overall summary and analysis

Strengths and developments in Safeguarding this term

Concerns or emerging themes across Safeguarding this term

Areas for development/planned actions for next term:

Report completed by.....

Date.....

When completing this report, please note:

- 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 any students under the age of 18 from maltreatment; preventing the impairment of their mental and physical health or 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.
- 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.
- Mental Health, 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).
- The Charity Commission requires charities to report serious incidents. A **'serious incident'** is an adverse event, whether actual or alleged, which results in or risks significant: harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work; or loss of your charity's money or assets; or damage to your charity's property; or harm to your charity's work or reputation. If a serious incident occurs in schools, the report will be made by the Head and Chair of the School Governing Body to the to the Chair and Deputy Chairs of the Trust and CEO. A judgement will then be made on whether a Serious Incident Report needs to be reported to the Charity Commission.

When reporting on incidents of specific safeguarding issues, please note:

- **Child-on-child sexual violence and sexual harassment** includes online, sexual comments, activity without consent, upskirting, youth produced sexual imagery;

- **Mental Health** includes suicidal ideation, suicide attempt, anxiety, depression;
- **Domestic and Honour based abuse** includes FGM and forced marriage;
- **Child exploitation** includes CCE, CSE, County Lines and Radicalisation.

Termly SGB safeguarding report – key data

	Autumn Term 2023	Spring Term 2024	Summer Term 2024	Autumn Term 2024
<u>Safeguarding development and training record</u>	Comment	Comment	Comment	Comment
<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 Governing Body 				

	Autumn Term 2023	Spring Term 2024	Summer Term 2024	Autumn Term 2024
Designated Safeguarding Lead (DSL) and Deputy DSL Training <ul style="list-style-type: none"> • Training attended • Updates shared • Job description reviewed 				
Staff training <ul style="list-style-type: none"> • In line with KCSIE • Induction of all new staff and volunteers • Safer recruitment training 				
<u>Statutory recording and reporting</u>				
No. of Unauthorised absences % of unauthorised against total absences				
No. of referrals to Child Missing In Education				
Total no. of Children in Public Care / Looked after / Privately fostered				

		Autumn Term 2023	Spring Term 2024	Summer Term 2024	Autumn Term 2024
No. of exclusions	Number of fixed-term exclusions				
	No. of permanent exclusions				
	Comment (optional)				
No. of referrals to LADO <i>(allegation against a member of staff)</i>					
No. of Low Level concerns <i>(allegations/concerns that do not meet the harm threshold) Nature of concerns</i>					
<u>Record of safeguarding cases and inter-agency working</u>					
No. of new safeguarding concerns referred by staff to DSL					
No. of new safeguarding concerns referred by DSL to the IFD or Early Help Team					
No. of children currently receiving support from a school-based professional (including school nurse, counsellor, mental health lead etc.					
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.					

		Autumn Term 2023		Spring Term 2024		Summer Term 2024		Autumn Term 2024	
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.									
<u>Reported incidents of specific safeguarding issues</u>		<i>Ongoing</i>	<i>New incident</i>	<i>Ongoing</i>	<i>New incident</i>	<i>Ongoing</i>	<i>New incident</i>	<i>Ongoing</i>	<i>New incident</i>
Child-on-child Abuse – No. of reported incidents	Cyberbullying								
	Homophobic Incident								
	Racist Incident								
	Physical Bullying								
	Sexual harassment and violence								
	Verbal Bullying								
Self-Harm	No. of reported incidents								
	No. of children severely self-harming								
Eating Disorders	No. of reported incidents								

		Autumn Term 2023		Spring Term 2024		Summer Term 2024		Autumn Term 2024	
	No. of children receiving further intervention								
Mental Health	No. of reported incidents								
	No. of children receiving further intervention								
Domestic and Honour based abuse – No. of reported incidents									
Child exploitation – No. of reported incidents									
<u>Serious Incident Reports</u>									
No. of Serious Incidents raised during this period (<i>not all Serious Incidents will be reported to the Charity Commission</i>).									
No. of serious incidents reported to the Charity Commission by the Trust.									

21. Appendix 5 – Annual safeguarding report to the School Governing Body and the Trust

Annual Safeguarding report to the School Governing Body and the Trust

Harpur Trust Safeguarding Policy, appendix 5

School:

Year: 2024-2025

Note for governors - how to use this report

This is the report of the Annual Review of Safeguarding. Terms of reference for the review are in Appendix 6 to the Trust safeguarding policy. School Governing Bodies should review this report and:

- a) **Note** any emerging themes, trends or issues in the overall summary and analysis, development and training record or key data.
- b) **Review** the safeguarding compliance checklist, and assure themselves that there is a robust and timely plan in place to resolve any point where further action is required
- c) **Decide** that they are assured that safeguarding is working effectively in the school, subject to any issues or outstanding points identified above.

Schools Committee will review this report and a note of the discussion to form its view on behalf of the Board that safeguarding across all Trust schools is working effectively.

Contents

- 1 Overall summary and analysis
- 2 Safeguarding development and training record
- 3 Annual safeguarding report – compliance checklist
- 4 Annual safeguarding report – key data

When completing this report, please note:

- 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 any students under the age of 18 from maltreatment; preventing the impairment of their mental and physical health or 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.
- 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.
- Mental Health, 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).
- The Charity Commission requires charities to report serious incidents. A **'serious incident'** is an adverse event, whether actual or alleged, which results in or risks significant: harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work; or loss of your charity's money or assets; or damage to your charity's property; or harm to your charity's work or reputation. If a serious incident occurs in schools, the report will be made by the Head and Chair of the School Committee to the to the Chair, Deputy Chair of the Trust and CEO. A judgement will then be made on whether a Serious Incident Report needs to be reported to the Charity Commission.

When reporting on incidents of specific safeguarding issues, please note:

- **Child-on-child sexual violence and sexual harassment** includes online, sexual comments, activity without consent, upskirting, youth produced sexual imagery;
- **Mental Health** includes suicidal ideation, suicide attempt, anxiety, depression;
- **Domestic and Honour based abuse** includes FGM and forced marriage;
- **Child exploitation** includes CCE, CSE, County Lines and Radicalisation.

Annual safeguarding report - overall summary and analysis

Strengths and developments across safeguarding in the most recent academic year:

Common issues, concerns or emerging themes raised during the year:

Areas for development and planned actions for the next academic year:

Annual Report and Safeguarding checklist completed by

.....

Date.....

Safeguarding development and training record

	Comment
Safeguarding policy and procedures <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 Governing Body 	
Designated Safeguarding Lead (DSL) and Deputy DSL Training. <ul style="list-style-type: none"> • Training attended • Updates shared • Job description reviewed 	
Staff training <ul style="list-style-type: none"> • In line with KCSIE • Induction of all new staff and volunteers • Safer recruitment training 	

Annual safeguarding report – compliance checklist

For any item below where further action is required, please list the required actions, owners and deadlines:

Action	Owner	Deadline

Compliance Item	Evidence of compliance e.g. Training Logs, certification, induction checklists, committee meeting minutes etc...	Action required Y / N
1. The Child Protection Policy is publicly available via the school 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 2024. 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, 2024		
4. The Headteacher and at least one school committee member has completed safer recruitment training.		
5. The school operates safer recruitment procedures and makes sure that all appropriate checks are carried out on new staff, volunteers and contractors 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 is checked regularly for accuracy.		
7. Procedures are in place for dealing with allegations of abuse against members of staff and volunteers, allegations of child-on-child abuse and for low-level		

Compliance Item	Evidence of compliance e.g. Training Logs, certification, induction checklists, committee meeting minutes etc...	Action required Y / N
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 Governing Body 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.		

Annual safeguarding report – key data

		2022-23	2023-24	2024-25
<u>Statutory recording and reporting</u>				
No..of Unauthorised absences % in relation to total absences				
No. of referrals to Child Missing In Education				
Total no. of Children in Public Care / Looked after / Privately fostered				
No. of exclusions	Number of fixed-term			
	Number of permanent			
	Comment (optional)			
No. referrals to LADO (<i>allegation against a member of staff</i>)				
No. of Low Level concerns (<i>allegations/concerns that do not meet the harm threshold</i>)				
<u>Record of safeguarding cases and inter-agency working</u>				
No. of new safeguarding concerns referred by staff to DSL				
No. of new safeguarding concerns referred by DSL to the IFD or Early Help Team				
No. of children currently receiving support from a school-based professional (including school nurse, counsellor, mental health lead etc.				
No. of children currently known to be receiving support from external agencies including Health Service, CAMH, CHUMs etc. who were not recorded in previous terms' reports.				
No. of children on 'Early Help Plan' who were not recorded in previous terms' reports.				
No. of children on 'Child In Need Plan' who were not recorded in previous terms' reports.				
No. of children on 'Child Protection Plan' who were not recorded in previous terms' reports.				
<u>Reported incidents of specific safeguarding issues</u>				
Child-on-child Abuse - No. of	Cyberbullying			
	Homophobic Incident			

		2022-23	2023-24	2024-25
reported incidents	Racist Incident			
	Physical Bullying			
	Sexual harassment and violence			
	Verbal Bullying			
Self-Harm	No. of reported incidents			
	No. of children severely self-harming			
Eating Disorders	No. of reported incidents			
	No. of children receiving further intervention			
Mental Health	No. of reported incidents			
	No. of children receiving further intervention			
Domestic and Honour based abuse No. of reported incidents				
Child exploitation – No. of reported incidents				
<u>Serious Incident Reports</u>				
No. of Serious Incidents raised during this period <i>(not all Serious Incidents will be reported to the Charity Commission).</i>				
No. of serious incidents reported to the Charity Commission by the Trust.				

22. Appendix 6 – 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 Schools Committee, that:
 - a policies are compliant with current law and best practice and are adhered to;
 - b prompt and appropriate action is taken where concerns are identified; and
 - c 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 Governing Body can assure itself and the Schools Committee that it has met its statutory and best practice obligations and that any areas of concern or trends have been identified and are being acted on.

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 (NSG) 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. A compliance checklist for school governing bodies is included within the template report at **Appendix 5**).
5. The review should consider key issues and support the effectiveness of the School's safeguarding processes.
6. The review should provide assurance that the welfare and safety of staff and students is properly managed and maintained and that prompt action is taken whenever any concerns are raised (from low level through to Serious Incidents) about the safety of any child. In addition, checks should also be made to ensure proper records are being kept.
7. The review should analyse data from the current and previous years to establish whether any patterns emerge, which could be a cause for concern.
8. The review should attempt to adduce evidence wherever possible to underpin the findings.

Reporting

9. The Nominated Safeguarding Governor and DSL should report on their findings jointly in writing to the school governing body and attend the school committee meeting at which the report is considered in order to answer any questions.
10. The Harpur Trust Education Team will collate the school reports in the Autumn term and provide a summary of patterns and trends that will be reported to the NSG.
11. The Harpur Trust Education Team will conduct a review of each of the school's Safeguarding Policies against Andrew Hall's Checklist For An Effective Safeguarding Policy and feedback to DSLs and NSGs.
12. The SGB will review the annual safeguarding report in the Autumn Term (for the Schools Committee meeting in December and the Board in January) to:
 - a) Note any emerging themes, trends or issues in the overall summary and analysis, development and training record or key data.

- b) Review the safeguarding compliance checklist, and assure themselves that there is a robust and timely plan in place to resolve any point where further action is required
- c) Decide that they are assured that safeguarding is working effectively in the school, subject to any issues or outstanding points identified above.

13. School Governing Bodies, Trust Committees and the Board will make formal notes in the minutes of their meetings on discussions on Safeguarding. Schools Committee will review a summary, the annual safeguarding report of each school and notes of the SGB discussions to form its view on behalf of the Board that safeguarding across all Trust schools is working effectively.

23. Appendix 7 - 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 14.			
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?			
6) Does the policy/procedure cover digital/remote delivery?			

Compliance Area	Where is the evidence? How do we know?	Action Required?	Completed Date
7) Does the project work specifically with offenders/ex offenders? If so, what is the risk assessment process?			
8) Is the policy/procedure presented to all staff/volunteers/trustees at induction?			
9) Who has had safeguarding training? What training? Where is this recorded?			
10) Who is DBS checked? Staff? Volunteers? Trustees? Enhanced or regular?			
11) Who is the nominated safeguarding officer?			
12) How are beneficiaries & their families made aware of the policy/ procedure?			
13) How would you identify & assess a safeguarding incident?			
14) How many safeguarding incidents do you record in an average year?			
15) Is the group a charity? Are they aware of Charity Commission guidance on Serious Incidents? Can they tell us what sort of thing might constitute a serious incident in the eyes of the Charity Commission? (not just safeguarding) 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, any reputational risk etc.			

Compliance Area	Where is the evidence? How do we know?	Action Required?	Completed Date
16) Does the organisation have a whistleblowing policy/procedure?			
17) How does the board discuss safeguarding?			
Signed (HT):		Date:	