



## Safeguarding Policy

**This policy refers to and should be read in conjunction with the Harpur Trust Whistleblowing Policy, Disclosure and Barring Service (DBS) Disclosure Policy, Recruitment and Selection Policy, Reporting of Serious Incidents Policy, Dignity at Work Policy, Guidance on Transgender Issues and the individual Child Protection policies at each of the Trust's schools.**

### Policy statement

1. Trustees, school committee members, senior leadership teams and staff of The Harpur Trust are fully committed to the rigorous implementation of safeguarding procedures and practices in order to safeguard and promote the welfare of all their beneficiaries, employees and others with whom the charity comes into contact so that they do not come to harm. Trustees regard this as a key governance priority.
2. The Harpur Trust operates four independent schools, which together educate a large number of young people. Therefore, in particular, the Trustees and staff of the Trust will ensure the protection of children and young people in their care from maltreatment; impairment of health or development; ensure they are growing up in circumstances consistent with the provision of safe and effective care; and take action to enable them to have the best outcomes, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. The Harpur Trust also provides accommodation for older people in almshouses and supports the local community by giving grants to local projects as well as having a programme of social investments and community events.

### Policy intention

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

### Legal framework

4. 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:
  - a. Charity Commission guidance on safeguarding for charities and trustees, November 2021
  - b. The Education Act, 2002

- c. Keeping Children Safe in Education, Department for Education, September 2022
- d. Working Together to Safeguard Children, Department for Education, July 2018
- e. Statutory framework for the Early Years Foundation Stage, Department for Education, September 2021
- f. National Minimum Standards for boarding schools, Department for Education, September 2022
- g. Strategy for dealing with safeguarding issues in charities, Charity Commission, December 2017

## Responsibilities

- 5. Charity Commission guidance<sup>1</sup> states that all charities have a responsibility to ensure they don't cause harm to anyone who has contact with them. Charities working with children at risk have extra responsibilities.
- 6. 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.
- 7. All Trustees are therefore responsible for ensuring safeguarding is well managed within each of the Trust's schools. The Board delegates general oversight of this to the relevant school committee. Trustees discharge their responsibilities by understanding the safeguarding governance and management arrangements at The Trust and its schools, including this policy, understanding the relevant guidance, and assuring themselves that the arrangements are working effectively.
- 8. Trustees, school committee 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*.
- 9. Trustees, members of school committees and senior leadership teams should read the Charity Commission Strategy for dealing with safeguarding issues, and the Trust's Policy on Reporting Serious Incidents.
- 10. Whilst Trustees and school committee members do not become involved in the operational management of safeguarding, school committees 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 comply with the law at all times.
- 11. Independent schools also have a statutory duty under section 157 of the Education Act 2002 to safeguard and promote the welfare of all children.
- 12. Each school committee 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

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<sup>1</sup> <https://www.gov.uk/guidance/safeguarding-for-charities-and-trustees>

Nominated Safeguarding Governor. Nominated Safeguarding Governors at the Trust's Schools are:

- **Lucy Davis: Pilgrims Pre-Preparatory School**
- **Andrew Edwards: Bedford School**
- **Toni Munno: Bedford Modern School**
- **Harriet Mather: Bedford Girls School**

13. 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. Appointed DSLs at the Trust's schools are:
  - **Tracey Marquand: Pilgrims Pre-Preparatory School**
  - **Matthew Gracie: Bedford School**
  - **Jude Goodacre: Bedford Modern School**
  - **Elaine Teale: Bedford Girls School**
14. The DSL is the primary contact of the Nominated Safeguarding Governor on safeguarding matters for each school.
15. Schools may choose to appoint one or more deputy designated safeguarding leads. Any deputy designated safeguarding lead will require an equivalent standard of training to the DSL. Details of additional DSLs and deputies are included in each school's individual Child Protection Policy.
16. 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, training, 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.
17. Trustees are also accountable for safeguarding through The Trust's other activities. The Board has delegated to the Community Strategy Group responsibility for the governance of the community programmes, including the grants programme and any Almshouse accommodation.
18. Responsibility for the management of safeguarding within the Harpur Trust Office including the Community Programmes Team is delegated to the Chief Executive.

## **Safeguarding principles**

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

20. 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.
21. We are committed to:
- a. **a child-centered approach.** *We recognise a child's welfare is paramount. Children are listened to and involved in decision-making and the development of safeguarding practices.*
  - b. **collective and coordinated responsibility.** *We recognise that safeguarding and promoting the welfare of children and others is everyone's responsibility and we contribute to effective inter-agency working.*
  - c. **openness, transparency and accountability.** *We ensure a clear line of accountability for discharging safeguarding responsibilities and promote transparency in the appropriate and timely recording, reporting and sharing of information. We recognise that abuse can happen in any organisation.*
  - d. **a culture of continuous learning and improvement.** *We actively seek opportunities to share and promote good practice across and beyond the Trust.*

## Safeguarding policies

22. Effective policies and procedures should be in place in each Harpur Trust school in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare in and outside the school environment. These should include:
- a. An **effective child protection policy** providing guidance on procedures and reporting systems to all (staff, children and young people and their parents/carers) and reflects the whole school approach to 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. A **behaviour policy**, reflecting measures to prevent bullying including cyberbullying, prejudice-based and discriminatory bullying.
  - c. A **staff behaviour policy** (sometimes called a code of conduct) which should amongst other things include acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.
  - d. **Appropriate safeguarding arrangements** to respond to children who go missing from education, particularly those on repeat occasions.
23. 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 home education, require mental health support, are looked after, have special education needs and disabilities or physical health issues, are LGBT.

24. Appendix 2 presents guidance on the specific safeguarding issues that should be included in each of the Trust's individual school policies.
25. Guidance and procedures on safeguarding issues are also contained in grant making policies and policies relating to the Trust's interests in almshouse activities (Almshouse Policy Number 8, Dealing with Abuse).
26. 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 6). If required, the Trust will refer applicants for further training and support, and improvements to their safeguarding processes may be a condition of the grant.

## Information Sharing

27. Information regarding safeguarding matters about children in the Trust's care should be shared effectively, and at the earliest possible appropriate time.
28. 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.
29. 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.

## Training

30. The Harpur Trust recognises the importance of training in enabling Trustees, school 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.
31. At induction, it is mandatory for Trustees and school committee members to participate in the appropriate safeguarding training, with a refresher training at least once every three years.
32. 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.
33. The DSLs in each of the Trust's schools 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 child protection updates at least annually.

### **Online safety**

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

### **Opportunities to teach safeguarding**

35. 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.

### **Safer recruitment**

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

### **Allegations**

37. 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 Whistleblowing Policy and the Trust's Staff Code of Conduct.
38. Each school in the Trust should have clear whistleblowing policy and procedures for dealing with allegations against staff in place and refer cases to the relevant authorities, accordingly, including Low Level concerns.
39. Allegations of abuse against any member of staff, including supply teachers, volunteers and contractors, at one of the Trust's schools must be reported to the Head teacher at the school.
40. Allegations against a Head teacher at a school in the Trust must be reported to the Chair of the school committee.
41. 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.

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

### **Monitoring compliance**

43. Although the Board and school committees 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.
44. Safeguarding is a standing agenda item at termly school committee meetings and an opportunity for timely reporting and reviewing of safeguarding issues. It is also a termly standing item in senior leadership team meetings in the Harpur Trust Office (HTO).
45. Informed by the school's Designated Safeguarding Lead, the Nominated Safeguarding Governor will report at least termly to the school committee using the *Termly/Annual Safeguarding report to the school committee* (Appendix 3).
46. To evidence appropriate assurance, school committees and the Board will make formal notes in the minutes of their meetings on discussions on safeguarding, including the annual review of safeguarding by the Board.
47. The Chair and Head teacher of each school will bring any matters of significant concern to the attention of the Chair and Chief Executive of the Trust as soon as they arise.

### **Annual review**

48. The schools' Designated Safeguarding Leads in partnership with the Nominated Safeguarding Governors are responsible for ensuring that the respective school's child protection policy is reviewed annually and that procedures and implementation are reviewed and updated regularly if required.
49. Each school committee will report to the Board annually in the autumn term (for the January meeting) confirming that the safeguarding arrangements in the school have been formally reviewed and meet the statutory requirements, drawing the Trustees' attention to any significant incidents or themes. Appendix 4 outlines the terms of reference for the annual review.
50. The purpose of the annual review of safeguarding in the school is to assure the Board of the Harpur Trust, through the school committee, that policies are compliant with current law and best practice and are adhered to; prompt and appropriate action is taken where concerns are identified; and proper records are being kept.
51. The report to the Board should include a *Termly / Annual Safeguarding report to the school committee* (Appendix 3), which collates or summarises the data presented in that year's termly reports and highlights any themes from previous years, and a completed *Safeguarding Compliance Checklist* (Appendix 5).

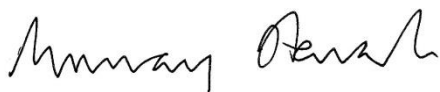
52. The Community Strategy Group will also report annually to the Board on safeguarding in community activities.
53. The Board will review and formally approve these annual reviews.

### **Serious Incident Reports to the Charity Commission**

54. As a charity, the Harpur Trust has a statutory duty to report serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:
  - harm to a charity's work, beneficiaries, staff volunteers or others who come into contact with the charity through its work
  - loss of a charity's money or assets
  - damage to a charity's property
  - harm to a charity's work or reputation
55. Should a serious safeguarding incident occur, then a Serious Incident Report to the Charity Commission will be considered in accordance with the Trust's Serious Incident Policy and Charity Commission guidance on charity and trustee duties to safeguard children.

### **Policy approval and review**

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



**Murray Stewart**  
**Chair of the Harpur Trust**

**19 January 2023**

### **Appendices below:**

1. Nominated Safeguarding Governor – Description of Responsibilities
2. Guidance on specific safeguarding issues to be included in respective school policies and in over-arching Trust policies.

### **Appendices attached:**

3. Termly / Annual Safeguarding report to school committee
4. Annual Review of Safeguarding in the school – terms of reference
5. Safeguarding Compliance Checklist for School Committees
6. Safeguarding Compliance Checklist for Grant Applicants



## 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 committee members<sup>2</sup>. To ensure that their obligations are discharged efficiently, each of the Harpur Trust's school committees will nominate a governor to have specific responsibility for safeguarding. This is in line with the requirement that schools have '*a senior board level lead to take leadership responsibility for their school's or college's safeguarding arrangements*'.<sup>3</sup>
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.

### 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

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<sup>2</sup> *Keeping children safe in education*, 2021, Part Two, para 78

<sup>3</sup> *Working Together to Safeguard Children*, 2018

well-being, safeguarding and child protection and support them in the performance of these duties;

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

**b. Supporting the Designated Safeguarding Lead (DSL)**

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

**c. Monitoring**

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

identify potential deficiencies. They will consider conducting unannounced inspections in addition to planned inspections. In addition the NSG should be satisfied that the school has appropriate systems in place to ensure that the SCR is up to date and accurate, and report on this to the school's governing body at the termly school committee meeting.

- vi. ensure that the identity of and contact details for the DSL(s) and NSG, together with an outline of duties, will be publicised widely within the School community to ensure that pupils, parents, staff and school committees understand the purpose and importance of the roles;
- vii. ensure that the school has an effective and robust method of recording safeguarding concerns and that concerns are recorded in writing at the time the concern arises;
- viii. be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are addressed through the curriculum and schemes of work;
- ix. ensure that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material;
- x. where applicable, ensure that staff have the necessary knowledge and understanding to keep looked after children safe, with identified staff tasked to promote the educational achievement of looked after children.

#### **d. Reporting**

- i. ensure that regular risk assessments of factors particular to the school which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special educational needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, child criminal exploitation, female genital mutilation and cyberbullying are carried out and reported to the school committee through the mechanism of the annual report;
- ii. report each term to the School Committee, including a summary of safeguarding matters with particular reference to any incident which has required reporting to the 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 sent by the School Committee to the Board of the Harpur Trust in the Autumn term for consideration at the January Trust Board Meeting) confirming that the safeguarding arrangements in the school have been formally reviewed and meet the statutory requirements, and drawing the Trustees' attention to any significant incidents or themes;

- iv. support the DSL by overseeing the annual review of the school's Safeguarding policies and arrangements and reporting to school committee on these matters in the Autumn Term, in accordance with the terms of reference set out in Appendix 4;
- v. work with the DSL to identify if any themes are developing that might give cause for concern and reporting these to the Trust Board via the school committee;
- vi. both provide to, and seek from, the local authority and other relevant agencies information about how the Governing Body's duties in respect of safeguarding and child protection have been discharged, if appropriate or requested.

### **Serious Incident Reporting**

9. 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 Serious Incident 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 Serious Incident Reporting Policy which outlines the criteria to be used to define and identify a 'serious incident' and provides guidance on internal recording and reporting procedures.

### **Training, advice and guidance**

11. In carrying out the role, the 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 Governors, the Head, Chief Executive or the Education Development Adviser. If they are in any doubt whatsoever about any matter, they should also discuss it with the Chair of the School Committee.

## Appendix 2 – Guidance on specific safeguarding issues to be included in respective school policies and in over-arching Trust policies<sup>4</sup>

**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 & External)
- ✓ Prevent duty and Channel programme - preventing radicalisation
- ✓ Peer-on-peer abuse (including sexting and up-skirting)
- ✓ Sexual violence and sexual harassment between children
- ✓ Upskirting
- ✓ Children with Special Educational Needs and disabilities

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

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

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

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

<sup>4</sup> These lists are not exhaustive and will be under review in light of new policy guidance. For further information about specific safeguarding issues, refer to *Keeping Children Safe in Education (2022)*, Annex B page 140.

*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.*