Learning For Life Trust: Safeguarding Compliance Framework

Purpose

This document establishes the minimum safeguarding standards and expectations that all schools within the Trust must meet to ensure full compliance with statutory guidance, Trust policies and best practice. It should be read alongside:

- Keeping Children Safe in Education (KCSIE)
- Working Together to Safeguard Children
- The Prevent Duty Guidance
- The Education Act 2002
- The Children Act 1989 and 2004
- Data Protection legislation
- Trust safeguarding policies and procedures
- Information sharing to safeguard children and young people

Safeguarding is everyone's responsibility. All staff, governors, trustees, volunteers, contractors and visitors have a duty to safeguard and promote the welfare of children.

1. Safeguarding Culture

Expectations

All schools must:

- Maintain a strong safeguarding culture where children's welfare is paramount and they feel listened to.
- Ensure safeguarding is visible, understood and prioritised across all aspects of school life.
- Promote an open, transparent culture where concerns can be raised without fear.
- Ensure children know how to report concerns, disclose abuse, seek help and identify trusted adults.
- Act upon concerns immediately and proportionately.
- Maintain professional curiosity and challenge where necessary.
- Ensure safeguarding is a standing agenda item within leadership and governance meetings.
- Promote equality, diversity and inclusion as part of safeguarding practice.
- Create a culture where low-level concerns are reported and managed appropriately.
- Have a process in place for the early identification and monitoring of pupils deemed vulnerable (this may include: SEND pupils, pupils in receipt of Family Help, children with an allocated social worker, pupils in receipt of pastoral support, disadvantaged and/or those whose behaviour and/or attendance gives cause for concern).
- Ensure effective practices, including duties, patrols and supervision to ensure that the school feels safe for all students.
- Maintain positive, working relationships with parents/ carers to ensure they can confidently and proactively safeguard their child(ren) and seek relevant support (if required).
- Have a whole school approach, across the curriculum, to ensure that all students are safeguarded.
- Take appropriate action to mitigate the risk of child-on-child abuse.
- Have a zero-tolerance approach to bullying and/or harassment.
- Recognise that abuse, in all its forms, ‘can happen here’.

2. Leadership and Accountability

Expectations

Each school must have:

Designated Safeguarding Lead (DSL)

- A member of the senior leadership team.
- Appropriate authority and capacity to fulfil responsibilities.
- Advanced safeguarding training- refreshed every two years.
- The role is detailed in the staff member's job description.
- Ongoing updates at least annually.
- Full compliance with Annex B of Keeping Children Safe in Education.

Deputy DSLs

- Sufficient deputies to provide effective cover (at least one DDSL as a minimum).
- A SENDCo should form part of the safeguarding team.
- Training equivalent to DSL level.
- The role is detailed in staff member(s) job description.

Headteacher Responsibilities (if not DSL)

- Overall accountability for safeguarding compliance.
- Ensure adequate staffing, training and resources.
- Ensuring the DSL has the capacity to fulfil role.
- Ensuring the DSL has access to and the capacity for Safeguarding Supervision.
- Ensure appropriate cover is in place to ensure an appropriate Safeguarding lead is available at all times during school hours.

Governors

- A nominated safeguarding governor.
- Appropriate safeguarding training relevant to role.
- Effective challenge and oversight.
- Ensuring the school has sufficient capacity for effective safeguarding provision and supervision.

3. Safeguarding Supervision

Expectations

All DSLs and Deputy DSLs **must** receive regular safeguarding supervision.

Minimum Requirements

- Formal supervision at least half-termly.
- Additional supervision following complex cases, for all practitioners involved.
- Opportunity for reflective practice.

- Challenge and support provided.
- DSL/ DDSL Supervision training (accredited either by: Kym Allan and/or CSCP).
- The school engage with the Family Help Partnership and Assurance.

Supervision Must Include

- Case discussions.
- Professional decision-making.
- Staff well-being.
- Escalation and challenge.
- Multi-agency working.
- Emerging safeguarding themes.

Options for supervision

- External supervision provider.
- Internal supervision.
- Via Trust Supervision support.

Record Keeping

- Clear records maintained via CPOMS (Supervision tag used).
- Actions identified and reviewed.

4. Recording and Record Keeping (CPOMS)

Expectations

All schools must use CPOMS as the Trust's safeguarding recording system; it serves as the official record of safeguarding concerns, actions and communications.

Designated Safeguarding Leads (DSLs) and Deputy DSLs are responsible for regularly reviewing all CPOMS entries relevant to their role, ensuring that the information recorded is fully considered, and taking appropriate action in accordance with statutory safeguarding guidance, Trust policies, and local procedures.

The recording of information on CPOMS does not in itself constitute action.

When staff are recording an urgent safeguarding concern on CPOMS, there is an expectation that they will have already verbally informed a member of the safeguarding team to the issue. Staff should follow-up concerns they have with the DSL to ensure relevant action is being taken. DSLs must read, assess and respond to the content promptly and ensure that all necessary follow-up actions are undertaken and recorded.

Recording Standards

All concerns must be:

- Recorded on CPOMS in an appropriate, timely manner.
- Clear, factual and objective.

- Chronological.
- Linked appropriately to previous concerns.
- Relevant staff, including the safeguarding team, are alerted.

CPOMS Expectations

- As a minimum, statutory categories and tags will be used.
- Appropriate agencies tagged.
- DSL/DDSL review completed promptly.
- Actions recorded clearly and timely.
- Outcomes documented.
- Chronologies maintained for use in Family Help and/or Child Protection Plans.
- Each student's document vault is used to keep a record of all relevant safeguarding documentation.
- Access to records on CPOMS should be restricted to the defined safeguarding team.
- Members of the safeguarding team (or staff the DSL judges needs to see relevant information), must use two-factor authentication for accessing CPOMS.
- Any paper records (sent with a child from a previous school), should be scanned and uploaded to the child's document vault.
- Headteachers/ DSLs should ensure that staff are following GDPR procedures specifically in relation to when sensitive documents are downloaded/ uploaded to CPOMS i.e. downloads deleted from a Recycling Bin.

Record Transfer

When pupils move schools:

- Reference the Trust's Pupil Transfer Guidance.
- Child protection records transferred securely and promptly in line with KCSIE expectations.
- Headteachers/ DSLs should ensure that all records are transferred and retained in-line with GDPR regulations.
- Confirmation of receipt obtained, where the receiving school does not use CPOMS.
- Where a student, with current and/or historic safeguarding concerns, transfers to a different setting, the DSL/ DDSL should have a handover conversation with the receiving school.

5. Staff Induction

Expectations

All new staff must receive safeguarding induction before working unsupervised with pupils.

Induction Must Include a meeting with the DSL and/or DDSLs and an overview of the following procedures/policies:

- Child Protection Policy.
- Staff Code of Conduct.
- Behaviour Policy.
- KCSIE Part One.
- Safeguarding response procedures, including the use of CPOMS.
- Whistleblowing procedures.
- Online safety expectations, including Filtering and Monitoring procedures.

- Managing allegations procedures.
- Sharing of nudes/ semi nudes' guidance
- Low-level concern procedures.
- An agreed training plan (including: safeguarding training- appropriate to role- online safety training, PREVENT training).

All procedures/policies should be made available to new staff with a clear timetable expectation for reading.

Verification

Schools must maintain:

- Signed induction records, including the training plan and reading list.
- The completed record should be stored in the relevant staff member's file (held centrally).

6. Safeguarding Training and Ongoing Engagement

Expectations

All Staff

- Safeguarding training at induction.
- Annual safeguarding training (explicit within appraisal) and reviewed at regular intervals, training should include:
    - Former 'Level 1' Safeguarding for all staff (annual)
    - Online Safety for all staff (annual)
    - PREVENT (biennial)
    - Domestic Abuse (biennial)- *contextualised Cumberland priority*
- Allergy Training
- Regular safeguarding briefings/ bulletins throughout the year (at least half-termly).

DSL/ DDSL Training

- Full DSL training- 'Further Awareness of the Safeguarding Environment' (formally Level 2) and 'Understanding the Levels of Need' (formally Level 3) (biennial)
- Ongoing updates and professional development (annually)
- Safer recruitment (every three years)
- Channel training (biennial)
- Attendance at Trust Safeguarding network meetings
- Attendance at Cumberland DSL network meetings

Governors

- Safeguarding training upon appointment.
- Regular refresher training- relevant to role (annual)
- Nominated governor(s): Safer recruitment (every three years)
- Online Safety (annual)
- Read and recommend the Child Protection Policy and read Keeping Children Safe in Education (annual)
- Regular safeguarding briefings/ bulletins/ updates (as and when appropriate).

Other specific training (all staff)

Where appropriate, on a cycle, the DSL should provide the following training/ briefings:

- Female Genital Mutilation (FGM)
- Code of Conduct
- Exploitation
- Child-on-child abuse
- Mental health
- Attendance
- Action Counters Terrorism (ACT)

Other specific training (relevant to role)

- Restrictive Intervention
- Paediatric First Aid/ Adult First Aid
- Food Hygiene
- Supporting specific Medical Conditions, including Allergy
- Family Help
- Safer Recruitment
- 'Further Awareness of the Safeguarding Environment' (formally Level 2)
- Safer handling

All training should be delivered from accredited sources, for example: CSCP and/or The National College.

All staff must read Keeping Children Safe in Education Part 1 and revisions/ updates to key policies including: Child Protection Policy, Whistleblowing Policy, Behaviour Policy and Online Safety annually.

Training Records

Schools must maintain:

- Training records for all staff (including certifications) and renewal dates.

7. Volunteers

Expectations

All volunteers must be appropriately vetted and supervised.

Before Commencing

Schools must:

- Assess suitability through informal interview.
- Request a character reference for each volunteer.
- Determine supervision arrangements.
- Complete written risk assessment for volunteers on school site, including suitable activities.
- Obtain DBS checks where appropriate (always for regulated activity).

- Add the volunteer to the SCR.

Induction

Volunteers must receive:

- Safeguarding briefing and leaflet, including key aspects of policy and procedure.
- Reporting procedures.
- Code of conduct.
- DSL information.

Supervision

- Volunteers must not undertake duties beyond agreed parameters.
- All relevant documentation is stored securely in a volunteer file, including: induction paperwork.

8. Safer Recruitment

Expectations

All recruitment processes must comply with KCSIE requirements and the Trusts policies in relation to safe recruitment.

9. Policies and Procedures

Mandatory Policies

Schools must maintain and review (as appropriate):

- Child Protection and Safeguarding Policy*
- Overarching Safeguarding Statement*
- Behaviour Policy*
- Attendance Policy*
- Online Safety Policy*
- Restrictive Interventions Policy
- Health and Safety Policy
- Educational Visits Policy
- Intimate Care Policy
- Supporting Children with Medical Conditions
- First Day Calling Policy/ procedure
- RSHE Policy*
- SEND Information Report*
- Accessibility Arrangements*
- Artificial Intelligence Policy*
- Allergy Policy*

Other Literature:

- Safeguarding leaflet for adults (visiting/ volunteers)*

- Safeguarding leaflet for contractors
- A display/ poster showcasing the Safeguarding Team and relevant roles

The Trust Policies include:

- Staff Code of Conduct*
- Whistleblowing Policy*
- Safer Recruitment Policy*
- Recruitment of Ex-Offenders Policy*
- Domestic Abuse Policy
- Trust Safeguarding Statement*
- Trust Safeguarding Strategy*
- Equality Statement*

Schools must have a system in place for recording that staff have read relevant policies and/or associated updates.

*These policies/ documents must be displayed on the school/ Trust website.

10. Online Safety

Expectations

Schools must ensure robust online safeguarding arrangements.

Requirements

- Appropriate filtering and monitoring systems in place.
- Appropriate audit and oversight of systems (annual report to Governors)
- A whole school approach to Online Safety, including explicitly in the academic and pastoral curriculum.
- Staff training provided (annually).
- Digital Technology Lead(s) identified, where this is different to the DSL.
- A nominated Governor (linked to Safeguarding).
- A safety plan in relation to the use of mobile phones.
- Emerging risks addressed.

Areas Covered (explicitly within the curriculum)

We would expect school to follow the 4Cs when teaching Online Safety (at an age-appropriate level):

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, deepfakes, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual and non-consensual

sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

This should also be explicit within the school's Online Safety Policy.

11. Prevent Duty

Expectations

Schools must fulfil statutory Prevent responsibilities.

Requirements

- Risk assessment completed and reviewed annually including request for updated PREVENT data.
- Prevent Lead identified.
- DSL/Prevent Lead understands their local context.
- Staff training completed (biennial).
- Referral processes understood.
- Accurate and timely recording of concerns on CPOMS- using the Prevent tag.
- Curriculum promotes critical thinking and British Values.
- Working in collaboration with parents and relevant agencies (where appropriate).

Monitoring

Schools must monitor:

- Vulnerability indicators (including SEND and exploitation).
- Extremism concerns.
- Radicalisation risks.

12. Multi-Agency Working

Expectations

Schools must actively engage with safeguarding partners.

Requirements

- Attend all strategy meetings.
- Attend all child protection conferences.
- Attend all core group meetings.
- Submit reports on time, including sharing with parents/ carers.
- Escalate concerns where necessary.
- Engage with and lead (where relevant) Family Help assessments to prevent escalation.
- Engage with external agencies where appropriate to promote support/ intervention.
- Where an Alternative Provision (AP) is deemed appropriate, the commissioning school remains responsible for the pupil's welfare and should assure itself that the AP provider has:

- Effective safeguarding arrangements.
- A named DSL and safeguarding contacts.
- Appropriate staff training and vetting.
- Procedures for reporting concerns back to the school and relevant agencies.
- Effective and regular communication about the child's needs/ vulnerabilities.

Professional Challenge

Staff must:

- Escalate concerns appropriately and timely.
- Use safeguarding partnership escalation procedures.
- Maintain professional curiosity.

13. Attendance and Missing Education

Expectations

Schools must identify and respond to attendance concerns swiftly. Schools should be aware that attendance is an absolute key indicator of safeguarding concerns.

Requirements

- Daily monitoring.
- First-day Calling procedures.
- Schools hold up-to-date and detailed information for students, including 2 (preferably 3) named, emergency contacts- not all from the same household.
- Analysis of vulnerable groups.
- Escalation procedures for persistent absence.
- Children Missing Education procedures followed and separate procedures in place for children 'going missing' during the school day, including communication with external agencies.
- Use the DfE's 'VYED – Monitor your school attendance' or equivalent tool to track trends and report termly to governors.
- Liaise regularly with the Access and Inclusion Officer.
- An Attendance Lead(s) is nominated and has responsibility for applying the Attendance Policy consistently and the associated monitoring/ reporting.
- Schools raise the profile of the importance of good attendance within their community and have associated incentives.
- Attendance, including key groups and trends, is reported to the Local Governing Board on a half termly basis.

Monitoring

Regular review of:

- Persistent absence.
- Severe absence.
- Attendance patterns.
- Safeguarding indicators.

14. Educational Visits and Off-Site Activities

Expectations

All educational visits must be planned and managed safely.

All educational visits are inclusive.

Requirements

- Risk assessments completed, including: safeguarding considerations, staff ratios and medical needs.
- Schools have a local, all visits risk assessment in place.
- EVC Leads identified and trained appropriately.
- An EVC Policy is in place.
- First aid arrangements in place.
- Emergency procedures established.
- Residential visits subject to enhanced scrutiny.

15. Site Security and Visitors

Expectations

Schools must maintain secure premises, this includes: site security at the beginning and end of the school day (i.e. the opening and closing of gates).

Requirements

- Visitor management system in place.
- Identification procedures.
- Visitor badges issued with safeguarding information presented/ displayed.
- Contractors managed safely and never left alone on site where students are present (unless they have DBS and feature on the school's SCR).
- Signing-in/out procedures followed.
- Prohibited rooms/ spaces are kept secure throughout the school day.

16. Safeguarding Audits and Quality Assurance

Expectations

Schools must participate in Trust safeguarding assurance activities.

Internal Audits

Minimum:

- Annual safeguarding audit, with identified actions for further improvement (using the Trust Audit tool or equivalent).
- Termly SCR review.

- CPOMS quality assurance reviews by the DSL, including: application of protocol, user access and analysis and tracking of trends/ vulnerable groups (including SEND).
- Policy compliance checks as part of on-going monitoring, including the use of student voice.
- A meeting between the DSL and nominated Safeguarding Governor on at least a termly basis.
- The Local Governing Board/ Safeguarding Committee receive updates on at least a termly basis.
- Staff, parent and student surveys must provide evidence of the effectiveness of safeguarding.

Trust Audits

Schools must:

- Cooperate fully with Trust Safeguarding Meetings.
- Cooperate, where appropriate, in school-to-school auditing of practice.
- Complete action plans within agreed timescales, including audits and policy updates.

External Validation

Schools should engage positively with:

- Ofsted inspections.
- Local authority reviews and partnership audits.
- Virtual School audits- linked to PEPs.
- Independent scrutiny from accredited organisations, for example: NSPCC and/or Kym Allan.

17. Safeguarding Website Compliance

Each school must have a specific safeguarding section on their school website. It should be easy to locate and clear for the intended audience. The school website must contain at least the following information (in relation to safeguarding):

- DSL name.
- Deputy DSL name(s).
- Safeguarding governor name and Chair of Governors identified.
- Contact details or reporting routes.
- Availability arrangements.
- How to report a concern about a child.
- How to report concerns about a member of staff.
- Whistleblowing routes.
- KCSIE (latest version).
- All policies listed in Section 9 marked with an *.
- Escalation and complaints where concerns are not addressed.
- Online safety expectations.
- Filtering and monitoring approaches.
- Advice for parents on digital safeguarding.
- Relevant parent resources available.
- Attendance expectations, including the times of the school day and term dates.
- Reporting absence procedures.
- Mental health support pathways.
- Pastoral support.
- External support agencies.

- Operation Encompass details
- A direct link to the CSCP website.
- Safeguarding culture is reflected across the website, including on the recruitment page.

18. Conclusion

The Trust expects safeguarding to be embedded within every aspect of school life. Compliance with this framework is mandatory for all schools and will be subject to regular review, challenge and quality assurance.