Sycamore Trust
Grow together, Learn forever

Safeguarding and Child Protection Policy 2026-2027

Applicable to all Trust schools

Adopted by:	Trust Board
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Next Review:	September 2027

Record of Procedure Changes and Reviews

Date	Summary of Changes
September 2022	Updated for KCSIE 2022.
September 2023	Updated for KCSIE 2023.
September 2024	Updated for KCSIE 2024.
September 2025	Updated for KCSIE 2025.
September 2026	Full rewrite for KCSIE 2026 and Bury local procedures. New provisions include Family Help, AI-related risks, revised child-on-child abuse procedures, information sharing, child protection file transfer, mental health and suicide risk, Operation Encompass, alternative provision, volunteer regulated activity, trainee teachers, premises and reasonable force.

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1. Statement of intent and scope

The Sycamore Church of England Trust is committed to safeguarding and promoting the welfare of every child. Safeguarding is everyone's responsibility. Every adult must maintain an attitude of "it could happen here", act in the best interests of the child and take prompt action when concerns arise.

This policy establishes a consistent Trust-wide framework while requiring each school to apply Bury Safeguarding Children Partnership procedures and the procedures of any other relevant placing local authority. It applies to trustees, local governors, employees, supply staff, trainee teachers, volunteers, contractors, visitors and any person working on behalf of the Trust.

The policy applies to all children under 18 who are pupils at a Trust school and, where relevant, to other children who come to the Trust's attention through its activities, premises or workforce. It covers harm within or outside the home, within or outside school, and online.

Our approach is rooted in the Trust values of inclusion, compassion, aspiration, resilience and excellence. We listen to children, remove barriers to reporting, provide timely support, maintain high expectations for vulnerable pupils and work openly with families and partner agencies whenever it is safe and appropriate to do so.

Immediate safeguarding principle
If a child is in immediate danger or at risk of immediate serious harm, contact the police on 999 and Bury Children's Social Care without delay. Do not wait for the DSL if delay would place a child at further risk.

2. Key principles and definitions

2.1 Safeguarding and promoting welfare

- providing help and support to meet children's needs as soon as problems emerge;
- protecting children from maltreatment, whether within or outside the home, including online;
- preventing impairment of children's mental or physical health or development;
- ensuring children grow up in circumstances consistent with safe and effective care;
- taking action to enable all children to have the best outcomes.

2.2 Child-centred practice

No single practitioner has a complete picture of a child's circumstances. Staff will identify concerns, listen carefully, share relevant information and act promptly. The child's wishes and feelings will be considered, but they will not prevent protective action.

Children will be told what is likely to happen next unless doing so would increase risk or compromise an investigation.

2.3 Abuse, neglect and exploitation

Abuse is maltreatment through action or failure to act. It may be physical, emotional or sexual, or take the form of neglect or exploitation. Harm may occur in families, institutions or communities, may be caused by adults or children, and may occur wholly or partly online. Safeguarding issues often overlap and must not be reduced to one label.

2.4 Terminology

The policy uses language that supports children and avoids blame. A child may not identify with the term "victim". "Alleged perpetrator" is used only where necessary. Staff will use language with which the child is comfortable and recognise that a child who has caused harm may also have experienced harm and need safeguarding support.

3. Legal and local framework

This policy has been prepared with due regard to the following legislation and guidance, as amended from time to time:

- Education Act 2002;
- Children Acts 1989 and 2004;
- Safeguarding Vulnerable Groups Act 2006;
- Sexual Offences Act 2003;
- Female Genital Mutilation Act 2003;
- Equality Act 2010 and Public Sector Equality Duty;
- Human Rights Act 1998;
- Counter-Terrorism and Security Act 2015;
- Domestic Abuse Act 2021;
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025;
- School Attendance (Pupil Registration) (England) Regulations 2024;
- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children, current edition;
- Early Years Foundation Stage statutory framework, section 3 where applicable;
- Prevent duty guidance, current edition;
- Information sharing advice for safeguarding practitioners, current edition;
- Bury Safeguarding Children Partnership procedures, Continuum of Need and Greater Manchester safeguarding procedures.

Where a statutory or local requirement changes during the policy year, the Trust will apply the current requirement and update this controlled document as soon as practicable.

4. Governance and leadership responsibilities

4.1 Trust Board

The Trust Board, as proprietor, retains strategic responsibility for safeguarding across the Trust. It will ensure that safeguarding policies, procedures and training comply with the law and are effective in practice.

- appoint a trustee with oversight of safeguarding and receive suitable training at induction and thereafter;
- ensure trustees and local governors understand KCSIE 2026 and their assurance role;
- appoint an appropriately senior DSL in each school and provide sufficient authority, time, funding, training and resources;
- ensure safeguarding and online safety, including filtering and monitoring, form part of the whole-school approach;
- ensure effective safer recruitment, allegations, low-level concerns and whistleblowing arrangements;
- ensure arrangements for child-on-child abuse are clear, preventative and responsive;
- assure the quality of alternative provision and off-site placements;
- consider safeguarding data, themes, pupil voice, audit findings, training compliance and lessons from cases;
- review this policy at least annually and whenever statutory or local arrangements change.

4.2 Local Academy Committees

Local Academy Committees provide local scrutiny and challenge. Each committee will nominate a safeguarding governor and, where separately appointed, an online safety governor. Governors will meet the DSL at agreed intervals, test implementation, review school-level risks and report assurance and concerns through the Trust governance framework.

4.3 Trust Leader and CEO

The Trust Leader ensures a coherent Trust-wide safeguarding culture, allocates resources, holds headteachers to account, supports escalation across schools and ensures that serious or systemic concerns are reported to the Trust Board and relevant authorities.

4.4 Headteachers

- implement this policy and local procedures;
- ensure the DSL and trained deputies are available and that absence cover is robust;
- ensure all staff know reporting routes and receive appropriate induction and updates;
- maintain a safe culture in which concerns about adults can be raised;
- ensure safeguarding records and referrals are timely, accurate and secure;
- ensure children's social care can access a child for statutory assessment;
- ensure arrangements for visitors, premises, clubs, transport, trips and external providers are safe;
- ensure parents can access this policy and understand the school's responsibilities.

5. Designated Safeguarding Lead and deputies

Each school will appoint a DSL from its senior leadership team. Lead responsibility cannot be delegated, although activities may be undertaken by trained deputies. Deputies will be trained to the same standard as the DSL.

5.1 Availability and continuity

A DSL or deputy will be available during school hours in term time. Arrangements for out-of-hours activities and school holidays will be proportionate to risk. Each school will maintain documented cover for illness, leave or other absence and a reliable, confidential route for receiving and monitoring concerns. A restricted-access safeguarding mailbox or equivalent system may support continuity but does not replace professional oversight.

5.2 Core duties

- manage referrals to children's social care, police, Channel, DBS and other agencies as required;
- support staff who make referrals and follow up outcomes;
- work with headteachers, SENCOs, attendance leads, designated teachers, mental health leads and external agencies;
- promote educational outcomes for children with a social worker and other vulnerable groups;
- lead on online safety and understand filtering and monitoring systems and processes;
- maintain detailed, accurate and secure records of concerns, discussions, decisions and rationale;
- ensure child protection files are transferred securely and promptly;

- understand local thresholds, Family Help arrangements and professional escalation routes;
- support staff wellbeing and access to supervision following difficult safeguarding work;
- ensure children's views are heard and barriers to disclosure are reduced.

5.3 Referrals and escalation

The DSL will follow Bury referral routes and Greater Manchester procedures. If a referral is not acknowledged or a response does not protect the child, the DSL will follow up and use the professional disagreement or escalation procedure. Staff may make a referral directly. Doing so does not remove the requirement to inform the DSL as soon as possible.

6. Responsibilities of all staff and volunteers

All staff, whether or not they work directly with children, will read at least Part One of KCSIE 2026 and receive the policies and information required at induction. School leaders will have mechanisms to check understanding and application.

- provide a safe environment and remain professionally curious;
- know the DSL and deputies and how concerns are recorded and reported;
- act immediately on any concern and never assume another person will act;
- listen, take the child seriously and avoid investigating or using leading questions;
- never promise confidentiality;
- share information only with those who need it for safeguarding;
- recognise that children may not feel ready or able to disclose and may not recognise harm;
- challenge abusive, discriminatory or harmful behaviour and never dismiss it as banter;
- understand online risks, AI-related risks, filtering and monitoring responsibilities;
- report concerns about adults, including low-level concerns, through the correct route;
- follow the Staff Code of Conduct, acceptable use and whistleblowing arrangements.

6.1 Female genital mutilation mandatory reporting duty

All staff must speak to the DSL about concerns relating to FGM. A teacher who, in the course of professional work, discovers that FGM appears to have been carried out on a girl under 18 must personally report this to the police in accordance with the statutory duty. The teacher must also inform the DSL unless there is a good reason not to do so. Concerns that a girl may be at risk are managed through normal safeguarding procedures.

7. Immediate response to concerns about a child

7.1 If a child makes a disclosure

1. Listen carefully and give the child time to speak.
2. Reassure the child that they have done the right thing by telling someone.
3. Do not promise secrecy and explain that information will be shared only with people who need to help.
4. Do not investigate, ask leading questions, confront anyone or seek evidence.
5. Record the child's words as accurately as possible, distinguishing fact, observation and professional judgement.
6. Report immediately to the DSL or deputy. If neither is available, speak to a senior leader or contact children's social care directly.
7. Take emergency action if the child is in immediate danger.

7.2 Decision routes

Following discussion with the DSL, options include internal pastoral support, a Family Help assessment, referral for section 17 support, referral under section 47, police involvement, health support or a combination of these. Parents will normally be informed unless this would increase risk, impede a police or social-care response, or be contrary to the child's welfare.

7.3 Recording

All concerns, including those not referred externally, must be recorded on the school safeguarding system without delay. Records must include date, time, source, factual detail, action, decision, rationale, people consulted, outcome and follow-up. Body maps must be used only to record visible injury and not as a substitute for medical assessment.

No delay
If the concern is urgent, make the referral first and complete the written record immediately afterwards.

8. Family Help and statutory intervention

8.1 Continuum of support

The Trust recognises a continuum from universal services and community-based Early Help, through targeted early help delivered through Family Help, to statutory support and child protection intervention. Staff will understand Bury's Continuum of Need and the criteria for targeted early help, section 17, section 20, section 31 and section 47 action.

8.2 Family Help

The DSL or deputy will generally lead liaison with other agencies and coordinate an assessment where a child and family would benefit from support before statutory intervention. Appropriately qualified practitioners who are not social workers may lead work with families up to and including section 17 where local arrangements permit. Cases will be reviewed regularly. If the child's circumstances do not improve, deteriorate or indicate actual or likely harm, the school will refer to children's social care without delay.

8.3 Children requiring particular alertness

- children with SEND, disabilities, medical needs or mental health needs;
- young carers;
- children who are pregnant or parents;
- children showing early abusive, violent or harmful behaviour;
- children repeatedly removed from class, subject to multiple suspensions, on part-time timetables or at risk of permanent exclusion;
- children absent from education repeatedly or for prolonged periods;
- children at risk of exploitation, trafficking or modern slavery;
- children affected by parental offending, domestic abuse, substance misuse or adult mental ill health;
- privately fostered children;
- children at risk of honour-based abuse, forced marriage or radicalisation.

9. Information sharing, records and transfer

9.1 Lawful information sharing

Data protection law does not prevent information sharing for safeguarding and welfare. Fear of sharing must not stand in the way of protecting a child. The Trust will share information lawfully, fairly, securely, proportionately and early enough to support effective action.

- share information relevant to the current risk and the recipient's safeguarding role;
- provide sufficient context and distinguish current risk from historic information;
- consider accuracy, necessity, proportionality and security;
- record decisions to share or not share and the rationale;
- seek consent where appropriate, but do not seek or rely on consent when doing so would place a child at risk or undermine safeguarding action.

9.2 Child protection records

Child protection records are confidential and separate from the main pupil file. Access is restricted to those who need it. Records are retained and disposed of under the Trust Records Management Policy and applicable law.

9.3 Transfer between schools

The child protection file will be transferred securely, separately from the main pupil file and as soon as possible. This will be within five days for an in-year transfer and within the first five days of a new term for a normal transition. Receipt will be obtained and recorded.
The exporting DSL will provide a structured summary of current concerns, relevant context, significant historic information, protective factors and ongoing support. The receiving DSL will review the file promptly. Where risk is significant or information requires clarification, the DSLs will speak directly. Relevant information may be shared before admission when necessary to establish a safe support plan.

10. Children potentially at greater risk

Some children face additional barriers to recognition, reporting or support. Increased vulnerability never means that harm is inevitable. Schools will avoid assumptions and make reasonable adjustments so that children can communicate and obtain help.

10.1 SEND, disability and medical conditions

- recognise communication barriers, intimate-care needs, isolation, dependence on adults and the risk that changes are attributed to a child's condition;
- ensure accessible reporting routes and communication support;
- liaise closely between the DSL and SENCO;
- consider online and offline risk;
- consider safeguarding referral where a medical incident suggests abuse, neglect or exploitation, including repeated failure to provide essential medication or safety information.

10.2 Children with a social worker

The DSL will work with the headteacher and relevant leads to understand how welfare concerns affect attendance, engagement and attainment; maintain high aspirations; and arrange appropriate academic support and reasonable adjustments.

10.3 Looked-after and previously looked-after children

The DSL will work with the designated teacher, social worker, carers and Virtual School Head. Previously looked-after children are not automatically care leavers. Records and decisions will use the child's correct legal status.

10.4 Lesbian, gay and bisexual children and children questioning gender

A child's identity is not itself a safeguarding risk. Bullying, discrimination, family or peer responses and wider vulnerabilities may increase risk. Children will have access to a trusted adult and be listened to sensitively. Where a child seeks support relating to gender, staff will consider the child's whole circumstances, involve the DSL, avoid informal or unilateral decisions, involve parents unless this would increase risk, document decisions and consider safeguarding, equality and human-rights duties. Detailed practice will follow current Trust procedure and statutory guidance.

10.5 Young carers and children affected by parental offending

Schools will identify effects on attendance, attainment, behaviour and wellbeing, provide support and make or support referrals to relevant local services.

11. Child-on-child abuse

Child-on-child abuse can occur inside or outside school and online. It is a safeguarding issue for both the child harmed and the child alleged to have caused harm. No reports does not mean that abuse is absent. Staff will be alert to times and places of heightened risk, including before and after school, transport, toilets, changing areas and online groups.

11.1 Forms

- bullying, cyberbullying, prejudice-based and discriminatory abuse;
- racism, faith-targeted abuse and other prejudice-based incidents;
- abuse in intimate personal relationships between children;
- physical abuse, serious assault, threatened harm and weapon-related harm;
- sexual harassment, sexual violence and harmful sexual behaviour;
- making or sharing nudes and semi-nudes, including altered or AI-generated images;
- upskirting;
- initiation or hazing-type violence and humiliation.

11.2 Culture and prevention

All staff will challenge inappropriate behaviour. Dismissing abuse as banter, part of growing up or harmless joking is unacceptable. Schools will use curriculum, supervision, environment, pupil voice and staff training to prevent harm and promote respectful relationships.

11.3 Initial response

8. Ensure immediate safety and attend to medical or emergency needs.
9. Listen without blame or shame and use the child's preferred terminology.
10. Report to the DSL immediately and make a factual record.
11. Consider risk to all children, witnesses and the wider school community.
12. Avoid unnecessary repeated accounts.
13. Consider parents, children's social care and police involvement in line with risk and statutory guidance.
14. Create and regularly review safety and support plans for each affected child.

12. Harmful sexual behaviour, harassment and violence

The DSL will make a proportionate, child-centred response based on age and development, nature and frequency, coercion, power imbalance, vulnerability, context, online elements and previous concerns. Support and disciplinary action may occur at the same time. The school will not wait for the conclusion of external proceedings before taking protective action.

12.1 Risk and needs assessment

For reports of serious harmful behaviour, harassment or violence, the DSL will complete and record an immediate risk and needs assessment covering the child reporting harm, the child alleged to have caused harm, other known or potential children, witnesses, classrooms, transport, online contact, high-risk locations and times, separation and supervision, and the support required. It will be reviewed whenever circumstances change.

12.2 Making or sharing nudes and semi-nudes

Every incident requires a safeguarding response, whether consensual or non-consensual and whether the image is photographed, altered or generated using AI. Staff must not view, copy, print, forward or ask a child to share an image. If an image is displayed inadvertently, staff will close or secure the device, report immediately and record what occurred. The DSL will follow current UKCIS guidance, consider evidence preservation and police advice, and ensure the child is not blamed or shamed.

12.3 Ongoing support

Plans will support education, attendance, wellbeing and safety for all affected children. Necessary sanctions will be applied under the Behaviour Policy, but safeguarding analysis will remain separate and ongoing. Information shared with families will be lawful and proportionate and will not compromise another child's privacy or an investigation.

13. Online safety, AI, filtering and monitoring

13.1 Whole-school approach

Technology is a significant component of safeguarding and wellbeing. Harm may occur online and offline at the same time. Schools will address content, contact, conduct and commerce risks through curriculum, acceptable use, staff training, parental engagement, secure systems and prompt incident response.

13.2 Artificial intelligence

AI can create or intensify safeguarding risks, including simulated interaction, manipulation, impersonation, misinformation, deepfakes, nudification tools, AI-generated harmful images, grooming, exploitation and disclosure of personal information. Schools will assess the safeguarding, ethical, data-protection and intellectual-property implications of AI tools before use and apply filtering and monitoring standards to relevant services.

13.3 Online risk categories

Category	Examples requiring safeguarding awareness
Content	Discriminatory or hateful content, self-harm or suicide content, extreme violence, misinformation, disinformation, conspiracy material and AI-generated harmful content.
Contact	Grooming, exploitation, harmful interaction with people or generative AI, financial exploitation and simulated relationships.
Conduct	Bullying, abusive or discriminatory messages, impersonation, creation or sharing of harmful images, online harassment and activity that facilitates offline harm.
Commerce	Scams, phishing, gambling, inappropriate advertising, in-app pressure and financial exploitation.

13.4 Filtering and monitoring

The Trust Board will ensure appropriate filtering and monitoring standards. The responsible senior leader, DSL and IT support will review arrangements at least annually and following significant change or incident. Reviews will cover internet-connected device types and relevant locations, consider pupil age and vulnerability, test effectiveness, include generative AI services where relevant, record findings and actions, and report assurance through governance.

Staff will understand what is blocked, what is monitored, how alerts are handled and how to report concerns. Filtering and monitoring must support, not replace, supervision, education and professional curiosity.

13.5 Mobile-phone-free environment for pupils

Trust schools will be mobile-phone-free during the school day by default. Any exception will be authorised, recorded and based on individual medical, SEND, safeguarding or other justified need. Detailed arrangements are set out in each school's mobile phone policy.

14. Domestic abuse and Operation Encompass

Children may see, hear or experience the effects of domestic abuse or experience abuse in their own relationships. Domestic abuse may be psychological, physical, sexual, financial or emotional and may be a single incident or a pattern.

14.1 Operation Encompass

Each school will identify a trained Key Adult, normally the DSL or deputy, and maintain a secure monitored safeguarding email route. Notifications will be accessed promptly, recorded securely and used to provide timely, sensitive and trauma-informed support. A notification does not replace professional curiosity, a referral to children's social care or police action where required. The school will not investigate the domestic abuse incident.

15. Exploitation, modern slavery and serious violence

15.1 Criminal and sexual exploitation

Exploitation involves an imbalance of power used to coerce, manipulate or deceive a child. It may involve exchange, financial advantage, status, threats or violence and may be facilitated by individuals, groups, organised networks or technology. A child cannot consent to exploitation. Staff will consider risk beyond the family and recognise that children may be criminalised for actions taken under coercion.

15.2 Modern slavery and trafficking

Where a child may be a victim of trafficking, modern slavery, criminal exploitation or sexual exploitation, the DSL will consider both a child-protection referral and referral through the National Referral Mechanism where appropriate. Children referred through the NRM may be eligible for specialist support.

15.3 Serious violence and weapons

Any concern that a child is carrying, using or intending to use a weapon must be reported immediately to the DSL or deputy. The DSL will assess risk to the child and others, consider wider context, put in place a written safety and support plan, consider police and children's social care involvement and take steps to de-escalate peer conflict. Staff will be alert to heightened risk around the school day and where education has been disrupted.

16. Specific safeguarding issues

16.1 Honour-based abuse, forced marriage and FGM

All concerns must be reported to the DSL immediately. Staff must not approach family or community members, attempt mediation or place the child at additional risk. The specific teacher reporting duty for known FGM is set out in section 6.1.

16.2 Private fostering

A private fostering arrangement may exist where a child under 16, or under 18 if disabled, is cared for by someone who is not a parent or close relative for 28 days or more. The DSL will notify the local authority when such an arrangement is identified.

16.3 Children and the court system, homelessness and abduction

Staff will consider the safeguarding impact of family court involvement, homelessness, custody disputes, child abduction and community safety incidents. Relevant concerns will be reported to the DSL and managed with appropriate agencies.

16.4 Cybercrime

Children with skill or interest in computing may become involved in cyber-dependent crime. The school will distinguish curiosity and learning from risk, provide positive pathways and refer safeguarding or criminal concerns in line with local and national guidance.

16.5 Allergy safety and medical emergencies

Schools will maintain individual healthcare and allergy-management arrangements, staff training, emergency medication access and risk controls in line with current law, statutory guidance and Trust procedures. Deliberate exposure, repeated failure to provide medication or other circumstances suggesting abuse or neglect will be reported to the DSL.

17. Attendance, children missing education and EHE

17.1 Absence from education

Repeated or prolonged absence can be a warning sign of abuse, neglect, exploitation, mental ill health, harmful behaviour, trafficking or risk of exclusion. Attendance and safeguarding teams will work together, share information and act promptly. Schools will make reasonable enquiries, escalate unexplained absence and use statutory attendance and CME procedures.

17.2 Children missing education

A child missing education is a child of compulsory school age who is not registered at a school and is not receiving suitable education elsewhere. Schools will follow the School Attendance (Pupil Registration) (England) Regulations 2024 and Bury notification procedures. Safeguarding action must not wait for a CME threshold or administrative process.

17.3 Elective home education

Home education is not inherently a safeguarding risk. Before removal from roll, schools will, where possible, discuss the decision with parents, the local authority and relevant professionals, particularly where the child has SEND, an EHCP, a social worker or other vulnerabilities. Concerns will be referred through safeguarding routes independently of the EHE process. The local authority will be notified as required.

18. Alternative provision, off-site education and work experience

The commissioning school remains responsible for safeguarding and the suitability of education. Placement cannot transfer accountability.

18.1 Due diligence

- know the provider and every address where the child will be educated, including subcontracted and satellite sites;
- obtain written confirmation of required safeguarding and recruitment checks;
- understand supervision, attendance, transport, incident, medical and emergency arrangements;
- require notification of staffing or site changes that affect risk;
- consider curriculum, quality, registration status and the child's needs;
- complete Trust due diligence even where a provider appears on a local approved list.

18.2 Monitoring

Every placement will be reviewed at least half-termly and immediately following a safeguarding concern or material change. Attendance and safe arrival will be monitored. The Trust may suspend or end a placement until concerns are resolved. Work experience and external activity will be risk assessed with appropriate checks and supervision.

19. Mental health, self-harm and suicide risk

Mental health difficulties can develop into safeguarding concerns and can indicate abuse, neglect or exploitation. Staff do not diagnose but should notice changes and act. Warning signs may include significant behaviour change, sustained sleep difficulty, withdrawal, loss of interest, eating difficulties, self-harm, suicidal ideation, planning or physical signs of self-neglect.

19.1 Response

- Immediate danger: call 999 or arrange immediate attendance at A&E through a parent, carer or other suitable adult.
- Urgent but not an emergency: use NHS 111 online or call 111 and select the mental health option.
- Safeguarding concern: report immediately to the DSL or deputy and follow child-protection procedures.
- Ongoing support: liaise with parents where safe, the senior mental health lead, Mental Health Support Team and specialist services.

Interventions offered by the school will be safe, evidence informed, appropriate to need and educational phase, and reviewed. Records will distinguish pastoral support from safeguarding action.

20. Prevent duty and radicalisation

The Trust will have due regard to the need to prevent people from being drawn into terrorism. Staff will receive training proportionate to role, recognise vulnerability and report concerns to the DSL. The DSL will assess need, seek advice and make a Channel referral or contact police where required. Prevent concerns will be managed as safeguarding concerns, with attention to proportionality, freedom of expression and the welfare of the child.

21. Safer recruitment and single central record

21.1 Recruitment principles

- at least one appropriately trained person will participate in each recruitment panel;
- job information will state safeguarding responsibilities;
- shortlisting and interview will test suitability and explore gaps or concerns;
- identity, right to work, qualifications, prohibition, direction, DBS and other required checks will be completed before appointment or managed through a documented statutory risk process where permitted;
- references will be obtained, scrutinised and verified;
- online searches may be undertaken for shortlisted candidates as part of due diligence;
- overseas checks will be considered where relevant;
- a clear record of decisions and checks will be retained.

21.2 Single central record

The SCR will record the checks required by KCSIE 2026 for employees and relevant others. Agency and third-party staff will be included even where they work for one day, with written confirmation and dates of checks recorded as required. The SCR will be subject to routine school and Trust assurance.

21.3 Ongoing suitability and referrals

Safeguarding does not end at appointment. Staff must disclose relevant changes as required by the Code of Conduct. The Trust will make referrals to the DBS and Teaching Regulation Agency when legal thresholds are met, including where a person leaves before a process is concluded.

22. Volunteers, visitors, contractors and agency staff

22.1 Volunteers and regulated activity

From 1 September 2026, a volunteer undertaking teaching, training, instructing or supervising children is in regulated activity where the activity is carried out frequently, on more than three days in any 30-day period, or overnight. The supervision exemption does not apply. Where a volunteer is in regulated activity, the Trust will obtain an enhanced DBS check including children's barred-list information. Existing volunteer arrangements will be audited against this test.

For volunteering outside regulated activity, the school will retain a written risk assessment setting out checks, supervision, frequency, role, access and vulnerability factors. A volunteer without required checks will not be left unsupervised or undertake

regulated activity. EYFS requirements will be applied before relevant volunteering begins.

22.2 Visitors and contractors

Schools will verify identity and purpose, apply appropriate checks, provide safeguarding information, use identification systems and determine supervision according to risk. Contractors and external organisations must provide written safeguarding assurance where required. Visitors will not be given unsupervised access to children unless checks and role justify it.

22.3 Supply staff and trainee teachers

The school shares safeguarding responsibility with agencies and training providers. Concerns will be managed under Part Four of KCSIE 2026. The school will gather facts and protect children; the employer or training provider normally leads employment action. Concerns involving a trainee teacher will be shared with the training provider. Ending a placement does not remove the duty to reach, record and act on an outcome.

23. Allegations and low-level concerns about adults

23.1 Harm threshold

An allegation may meet the harm threshold where a person has behaved in a way that harmed or may have harmed a child, may have committed a criminal offence against or related to a child, behaved towards a child in a way indicating risk of harm, or behaved in a way indicating possible unsuitability to work with children, including conduct outside work.

Concerns about a staff member must be reported immediately to the headteacher. Concerns about a headteacher must be reported to the Trust Leader and Chair of Trustees. Concerns about the Trust Leader must be reported to the Chair of Trustees. The case manager will seek LADO advice without delay and before investigating. Direct contact with the LADO is available where normal reporting creates a conflict or the reporter believes action has not been taken.

23.2 Low-level concerns

A low-level concern is behaviour inconsistent with the Staff Code of Conduct that does not meet the harm threshold. It may be minor, inappropriate, inadvertent or simply create a sense of unease. All low-level concerns, including those about agency staff, contractors and trainees, must be shared, recorded and reviewed for patterns. The rationale for categorisation and action will be documented. The relevant employer or provider will be informed where appropriate.

23.3 Whistleblowing

Staff who feel unable to raise a concern internally or believe it has not been addressed may use the Trust Whistleblowing Policy or contact the NSPCC Whistleblowing Advice Line. No person should suffer detriment for raising a genuine safeguarding concern in good faith.

24. Curriculum, pupil voice and prevention

Schools will provide an age-appropriate, inclusive and sequenced safeguarding curriculum through relationships, health, online safety and wider personal development. It will teach boundaries, consent, respectful behaviour, healthy relationships, prejudice and discrimination, online manipulation, image sharing, AI-related risks, exploitation, radicalisation, reporting and how to obtain help.

Pupil voice will be used to identify unsafe places, times and online spaces and to test whether reporting routes are known and accessible. Children will have more than one way to report and will know who trusted adults are. Schools will make adaptations for age, SEND, communication and language.

25. Mobile phones, images and personal devices

Staff, volunteers and visitors will follow the Staff Code of Conduct and school arrangements for personal devices. Personal devices must not be used to photograph or record pupils. Approved school equipment and systems will be used for educational images, with consent and safeguarding controls. Smart watches and other connected devices must not distract from supervision or create unauthorised recording or communication.
Pupil devices will be managed under the school's mobile phone and acceptable-use policies, consistent with the mobile-phone-free default in section 13.5. Any suspected harmful image or online incident will be reported to the DSL immediately.

26. Premises, toilets, changing and residential activities

Schools will maintain arrangements that protect privacy, dignity, comfort and safety. For pupils aged eight and over, separate toilets will be provided for boys and girls except where an individual room is intended for one pupil at a time and is lockable from the inside. Any mixed-sex individual provision will be risk assessed. Alternative individual facilities may be arranged when needed without compromising statutory provision. Changing, showering, intimate-care, PE, swimming, residential visits and sleeping arrangements will be risk assessed, supervised appropriately and documented. Individual arrangements will be communicated to relevant staff and reviewed. Schools with pupils aged 11 or over at the start of the academic year will apply the relevant changing accommodation requirements.

27. Reasonable force and restrictive intervention

Reasonable force may be used only where lawful and necessary to safeguard a child or others. It must be no more than necessary and for the least amount of time. A blanket no-contact policy is not appropriate because it may prevent staff from protecting children.

Particular care will be taken where a child has SEND, a medical condition, trauma or mental health needs. Schools will use reasonable adjustments, positive support plans and de-escalation to reduce the likelihood of restriction. Every significant incident will be recorded, parents informed where appropriate and the plan reviewed. Any concern that force was unnecessary, excessive or punitive will be managed as a safeguarding concern.

28. Early years provision

Schools with nursery or reception provision will apply section 3 of the current EYFS statutory framework alongside KCSIE 2026. The Trust will ensure required checks, safeguarding training, paediatric first aid, supervision, ratios, suitable people, safe premises, medication, mobile phone and camera arrangements and notification duties. EYFS volunteer barred-list requirements will be completed before relevant work begins.

29. Use of premises by external organisations

When premises are used for non-school activities, the Trust will obtain safeguarding assurance proportionate to the activity. Letting agreements will require appropriate policies, vetting, supervision, insurance, incident reporting and cooperation with the school. A safeguarding concern linked to an external provider using Trust premises will be referred to the appropriate agency and may lead to suspension or termination of use.

30. Training, supervision and support

- all staff receive safeguarding and child-protection training, including online safety, filtering and monitoring, at induction and regularly thereafter;
- all staff receive safeguarding updates as required and at least annually;
- DSLs and deputies complete role-specific training at least every two years and refresh knowledge between formal courses;
- trustees and governors receive training at induction and updates appropriate to their assurance role;
- safer-recruitment training is maintained for relevant panel members;
- training includes local Bury procedures, Family Help, child-on-child abuse, discrimination, AI, mental health, exploitation, attendance and concerns about adults;

- leaders evaluate understanding and impact, not only attendance;
- staff receive support and appropriate supervision following distressing cases.

31. Monitoring, assurance and review

The Trust Board will review this policy at least annually. The Trust may issue an addendum or immediate procedural instruction where law, statutory guidance, local arrangements or an urgent safeguarding risk changes during the year.

31.1 Assurance evidence

- section 175 audit and external safeguarding review findings;
- school safeguarding audits and action plans;
- training completion and impact checks;
- quality and timeliness of referrals and escalation;
- child-on-child abuse themes and response quality;
- attendance, CME, suspension and part-time timetable themes;
- filtering and monitoring review;
- alternative provision due diligence and half-termly monitoring;
- safer recruitment, volunteer audit and SCR checks;
- Operation Encompass arrangements;
- pupil voice and accessibility of reporting;
- lessons from local and national reviews and from Trust cases.

The policy owner will ensure that contact details and appendices are controlled and updated. Each headteacher will complete the school-specific schedule before publication and whenever personnel change.

32. Appendix A: Bury contacts and referral routes

Controlled contact schedule
Contact details can change. Each school must check this schedule against current Bury published information at least termly and record the check. In an emergency call 999.

Service	Contact
Targeted Early Help: Prestwich and Whitefield	Vicki Burgess | 0161 253 7303 | v.burgess@bury.gov.uk
Targeted Early Help: East and North	Faye Higgens | 0161 253 6601 | f.higgens@bury.gov.uk
Targeted Early Help: Radcliffe	Jill Wilson | 0161 253 6573 | j.wilson@bury.gov.uk
Multi-Agency Safeguarding Hub (MASSH)	0161 253 5678 | Monday to Friday, 8:45am to 4:45pm
Emergency Duty Team	0161 253 6606 | outside office hours
Initial Response Team	0161 253 5454 | children already open to a social worker
Family Safeguarding Team	0161 253 6868 | children already open to a social worker
Complex Safeguarding Team	Contact MASSH on 0161 253 5678
Care and Support Service	0161 253 6666 | children open to a social worker
Virtual School Headteacher	Catherine Hobday | 07583 015321 | c.hobday@bury.gov.uk
Community Education and Safeguarding Manager	Gina French | 0161 253 5811 | g.french@bury.gov.uk
Lead Safeguarding Officer for Schools and Colleges	Lisa Ricketts | 0161 253 5773 | 07351 618627 | l.ricketts@bury.gov.uk
Local Authority Designated Officer	Mark Gay | 0161 253 6168 | 07583 877250 | LADO@bury.gov.uk
Police	999 emergency | 101 non-emergency

Local procedures: Bury Safeguarding Children Partnership Continuum of Need; Bury referral arrangements; Greater Manchester safeguarding procedures; professional disagreement and escalation process; current CME and EHE notification arrangements.

33. Appendix B: School-specific safeguarding information

Required information	School entry
School name	St. Stephen's
Headteacher	Mrs Sally Denney
Designated Safeguarding Lead	Mrs Sally Denney
Deputy DSLs	Mrs Nicola Garside Mr Benjamin Smith
SENCO	Mr Benjamin Smith
Attendance lead	Mrs Sally Denney
Designated teacher for looked-after and previously looked-after children	Mrs Sally Denney
Senior mental health lead	Mrs Charlotte Cooney
Operation Encompass Key Adult	Mrs Sally Denney
Senior leader responsible for filtering and monitoring	Mrs Sally Denney
Safeguarding governor	Mrs Sarah Howard
Online safety governor	Mrs Sarah Howard
Chair of Local Academy Committee	Mrs Sarah Howard
Out-of-hours safeguarding arrangement	Information on website clearly displayed In term time school hours: Mrs S Denney (Headteacher) In school holidays office hours: 0161 253 5678 for Bury Children's Services MASH Team Out of hours: 0161 253 6606 for the Duty Social Worker
Safeguarding recording system	CPOMS
Date contact schedule checked	24.09.2026

34. Appendix C: Immediate response flowchart

Step	Action
1. Notice or receive	A child discloses, a concern is observed, an alert is received or information is shared.
2. Protect	Address immediate safety or medical needs. Call 999 if there is immediate danger.
3. Listen	Listen, reassure, do not investigate, do not promise confidentiality and avoid leading questions.
4. Report	Tell the DSL or deputy immediately. If unavailable and delay creates risk, contact children's social care or police directly.
5. Record	Make a factual, timed record using the child's words where possible. Record action and people informed.
6. Decide	DSL considers internal support, Family Help, section 17, section 47, police, health or other specialist action.
7. Follow up	Confirm referral receipt, escalate if necessary, implement safety and support plans and review impact.

35. Appendix D: Associated Trust and school policies

- Staff Code of Conduct and acceptable-use arrangements;
- Behaviour and Anti-Bullying Policy;
- Child-on-Child Abuse procedure;
- Online Safety and Cyber Security policies;
- Mobile Phone and Personal Devices Policy;
- Data Protection and Records Management policies;
- Safer Recruitment Policy;
- Allegations and Low-Level Concerns procedure;
- Whistleblowing Policy;
- Attendance, CME and EHE procedures;
- SEND, Equality and Accessibility policies;
- Supporting Pupils with Medical Conditions and Allergy procedures;
- Intimate Care Policy;
- Reasonable Force and Restrictive Intervention Policy;
- Educational Visits Policy;
- Alternative Provision and External Provider procedure;
- Looked-After and Previously Looked-After Children Policy;
- Prevent Risk Assessment and Action Plan;
- Lettings and Use of Premises Policy;
- Complaints Policy.

36. Appendix E: Core acronyms

Acronym	Meaning
AP	Alternative Provision
BSCP	Bury Safeguarding Children Partnership
CCE	Child Criminal Exploitation
CME	Children Missing Education
CSC	Children's Social Care
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
DSL	Designated Safeguarding Lead
EHE	Elective Home Education
EHCP	Education, Health and Care Plan
EYFS	Early Years Foundation Stage
FGM	Female Genital Mutilation
HSB	Harmful Sexual Behaviour
KCSIE	Keeping Children Safe in Education
LADO	Local Authority Designated Officer
MASSH	Multi-Agency Safeguarding Hub
NRM	National Referral Mechanism
SCR	Single Central Record
SEND	Special Educational Needs and Disabilities
UKCIS	UK Council for Internet Safety

37. Reference sources

Department for Education, Keeping Children Safe in Education 2026, September 2026.
Bury Council, Safeguarding and Child Protection Policy 2026/2027 for Schools and Colleges, working model.

The Sycamore Church of England Trust, Safeguarding and Child Protection Policy 2025, used as the starting policy for this full revision.

Pre-adoption check

Before Trust Board approval, confirm enactment and commencement of any new 2026 legislation, verify all live Bury contact details, complete each school-specific appendix and cross-check linked policies so that operational practice matches this policy.