



Safeguarding & Child Protection Policy

(Including KCSIE 2025 updates and local procedures for Rochdale & Oldham)

Policy owner: Tree of Life

Approved by (proprietor/board): Catherine Widdrington

Date approved: 04/12/25

Date of next review (at least annually): December 2026

1. Purpose and scope

Tree of Life (“the provision”) is a therapeutic Alternative Provision (AP) working with children and young people who may be vulnerable and/or have experienced trauma, exclusion from mainstream education, or social, emotional and mental health needs.

This policy sets out how Tree of Life will:

- Safeguard and promote the welfare of all children and young people attending the provision.
- Meet statutory duties under **Keeping Children Safe in Education (KCSIE) 2025**, which replaces all previous editions of the guidance. [GOV.UK+1](#)
- Work in line with **Working Together to Safeguard Children 2023** and the wider statutory framework including the **Children Acts 1989 and 2004** and **Education Act 2002, s175**. [GOV.UK+2GOV.UK+2](#)
- Follow local safeguarding arrangements for **Rochdale** and **Oldham**.

This policy applies to:

- All staff (permanent, temporary, agency, sessional, and volunteers).
 - Governors/proprietors, directors and trustees.
 - External professionals and therapists working on site.
 - Contractors or visitors who may have contact with children.
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2. Legal and statutory framework

Tree of Life will have due regard to the following key legislation and statutory guidance (non-exhaustive):

- **Children Act 1989 & 2004** – establish duties to safeguard and promote the welfare of children, and to make enquiries where there is reasonable cause to suspect significant harm. [GOV.UK](#)
- **Education Act 2002, Section 175** – duties on governing bodies and proprietors to safeguard and promote the welfare of pupils. [GOV.UK+1](#)
- **Working Together to Safeguard Children 2023** – statutory multi-agency safeguarding guidance, which applies in full to all education providers. [GOV.UK+1](#)
- **Keeping Children Safe in Education (KCSIE) 2025** – statutory guidance for schools and colleges; the 2025 version replaces previous editions and incorporates updates from 2022–2024. [GOV.UK+2NSPCC Learning+2](#)
- **Equality Act 2010** – duties to prevent discrimination, harassment and victimisation. [GOV.UK](#)
- **Data Protection Act 2018 / UK GDPR** – on information sharing and data protection. [GOV.UK+1](#)

Tree of Life will also follow local **multi-agency safeguarding arrangements** for Rochdale and Oldham. [greatermanchesterscp.trixonline.co.uk+1](#)

3. Definitions

- **Child:** Anyone under 18 years of age. [GOV.UK+1](#)
- **Safeguarding:**
 - Providing help and support as soon as problems emerge.
 - Protecting children from maltreatment (including online).

- Preventing impairment of health or development.
 - Ensuring safe and effective care.

 - Taking action so all children have the best outcomes. [GOV.UK+1](#)

 - **Child protection:** Activities to protect specific children who are suffering, or at risk of suffering, significant harm. [GOV.UK+1](#)

 - **Alternative Provision (AP):** Education arranged for pupils who, because of exclusion, illness, or other reasons, would not otherwise receive suitable education, or who require different provision to meet their needs. [NSPCC Learning](#)
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4. KCSIE – recent and current updates (for staff awareness)

Tree of Life will ensure that the DSL and leadership team stay up to date with changes to KCSIE. As of **September 2025**, the following key points are particularly relevant: [NSPCC Learning+1](#)

- **KCSIE 2025:**
 - Confirms that “**Working together to improve school attendance**” is now statutory guidance.
 - Expands online safety risk categories to include **disinformation, misinformation and conspiracy theories**.
 - Includes more information on DfE guidance on **generative AI**.
 - Provides additional information and clarity around **alternative provision guidance**.
 - Clarifies expectations around **Virtual School Heads**, including children in kinship care.

- **KCSIE 2024** (now incorporated into 2025):
 - Aligns the definition of safeguarding with **Working Together 2023**.
 - Provides more detail around **early help**.
 - Emphasises use of **DfE data protection guidance** for schools.
 - Re-emphasises that schools/APs retain safeguarding responsibility for pupils placed in **alternative provision**. [NSPCC Learning+1](#)

- **KCSIE 2023** (also carried forward):
 - Clarifies roles/responsibilities for **filtering and monitoring**.
 - Stresses that being **absent**, as well as missing, from education can indicate abuse or exploitation.

- Includes more information on **online pre-recruitment checks** and handling allegations connected with the use of **school premises** by other organisations. [NSPCC Learning](#)

The DSL will ensure induction and annual safeguarding training highlight these updates and how they apply in Tree of Life's context as a therapeutic AP.

5. Safeguarding principles in a therapeutic AP

Tree of Life's approach is rooted in:

- **Trauma-informed and attachment-aware practice.**
 - Recognition that behaviour is a form of communication.
 - A relational, therapeutic environment that balances **safety, structure** and **compassion**.
 - Strong partnership working with families, social workers, commissioners, and other professionals. [GOV.UK+1](#)
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6. Roles and responsibilities

6.1 Proprietor / Board of Directors

The proprietor/board will:

- Ensure Tree of Life complies with KCSIE, Working Together, and other statutory duties. [GOV.UK+1](#)
- Appoint a **Designated Safeguarding Lead (DSL)** and at least one **Deputy DSL**.
- Ensure **safer recruitment** procedures are followed.
- Oversee a **strong safeguarding culture**, including appropriate training, supervision, and policy review at least annually.
- Ensure effective **filtering and monitoring systems** are in place for IT, in line with KCSIE. [NSPCC Learning+1](#)

Governance and Leadership

Role	Name	Role description	Contact
Proprietor / Chair	Catherine Widdrington	Strategic oversight	07359 496 452

Safeguarding Lead	Tracy Chapman-Ward	Monitors safeguarding, meets DSL termly	07566 207 192
Health & Safety Lead	Sian Hughes	Premises and physical safety	07359 496 452

6.2 Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for safeguarding and child protection, including: [GOV.UK+1](#)

- Managing **referrals** to children’s social care, Channel/Prevent, the police and other agencies.
- Liaising with **Rochdale Borough Safeguarding Children Partnership** and **Oldham Safeguarding Children Partnership**. [greatermanchesterscp.trixonline.co.uk+1](#)
- Acting as point of contact for **placing schools, local authorities and commissioners**.
- Promoting the educational outcomes and welfare of children who have/need a social worker, and those looked after or previously looked after.
- Ensuring staff receive **induction** and **at least annual** safeguarding updates.
- Maintaining secure, accurate **safeguarding records** and ensuring appropriate information is shared when pupils move on.

DSL team

Role	Name	Contact (email & phone)	Deputy for
DSL	Tracy Chapman-Ward	07566 207 192 tracy.chapman@tree-of-life-ltd.co.uk	N/A
Deputy DSL	Catherine Widdrington	07359 496 452 info.treeoflife03@gmail.com	DSL
Deputy DSL	Chloe Hayes	07359 496 452 chloe.hayes@tree-of-life-ltd.co.uk	DSL

6.3 All staff, volunteers and contractors

All adults working at Tree of Life must:

- Understand that **safeguarding is everyone's responsibility**. [GOV.UK+1](#)
 - Read and understand at least **Part 1 (or Annex A, as appropriate) of KCSIE 2025**. [GOV.UK+1](#)
 - Be alert to signs of abuse, neglect, exploitation, mental health difficulties and contextual risks (e.g. county lines, online harm).
 - Record and report concerns **immediately** to the DSL/Deputy DSL, and never promise confidentiality to a child.
 - Contribute to a **therapeutic, respectful and inclusive culture**.
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7. Safer recruitment, induction and training

Tree of Life will:

- Follow KCSIE and other guidance on **safer recruitment**, including appropriate **pre-employment checks**, enhanced DBS (with barred list checks where required) and online checks for shortlisted candidates. [GOV.UK+1](#)
 - Ensure **job descriptions** and **person specifications** reference safeguarding responsibilities.
 - Provide **safeguarding induction** for all staff, including volunteers and therapists.
 - Ensure **regular, at least annual** safeguarding and child protection training for all staff, with updates on KCSIE changes, local learning and emerging risks.
 - Provide additional, advanced training and supervision for the **DSL and Deputies**.
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8. Code of Conduct

Code of Conduct

Our Code of Conduct ensures a safe, respectful, and professional environment for staff, learners, and visitors within our alternative provision. It sets clear expectations for behaviour, safeguarding, and appropriate interactions.

Physical Contact

- Physical contact between staff and learners must be **appropriate, limited, and proportionate**, and only used when necessary for educational support, care needs, or to prevent harm.
 - Staff should **avoid initiating unnecessary contact** and must always consider the learner's feelings, personal space, and dignity.
 - Where physical intervention is required for safety, staff must follow the provision's **positive handling/restraint policy** and record incidents as required.
 - Learners must respect personal boundaries and avoid any physical behaviour that may cause discomfort, harm, or inappropriate familiarity.
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One-to-One Learning

- One-to-one sessions should take place in **visible, open, or accessible spaces**, such as rooms with windows, open doors, or areas where others are present nearby.
 - Staff must **inform colleagues** when undertaking one-to-one work and ensure arrangements are recorded if needed.
 - Conversations during one-to-one sessions should remain **professional, focused on learning or wellbeing**, and must never become personal or overfamiliar.
 - Learners should feel safe and supported, and know who to speak to if they ever feel uncomfortable during one-to-one support.
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Social Media and Communication

- Staff must **not communicate with learners via personal social media accounts**, messaging apps, or personal email under any circumstances.

- Professional communication should take place only through **approved platforms and channels**, following organisational safeguarding protocols.
 - Staff must not share personal information online that could compromise their professional standing or the safety of learners.
 - Learners should be encouraged to use social media safely and responsibly, avoid inappropriate contact, and report concerns about online behaviour.
 - Visitors and external professionals must adhere to the same professional boundaries and communication rules.
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Use of Personal Devices

- Staff must not use personal mobile phones or devices for **photographing, filming, or communicating with learners**.
- Personal mobile devices should be used **discreetly and appropriately**, and never in front of learners unless required for work purposes and authorised by leadership.
- Learners must follow the provision's mobile phone policy, which may include restrictions on use during learning time to prevent distractions or safeguarding risks.
- Any misuse of personal devices—including taking inappropriate images, recording others without permission, or accessing unsuitable content—will be addressed according to safeguarding and behaviour procedures.

9. Recognising and responding to concerns

9.1 Types of abuse and safeguarding concerns

Tree of Life recognises the four main categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

And wider safeguarding issues including (non-exhaustive):

- Child sexual exploitation (CSE) and child criminal exploitation (CCE).

- Child-on-child abuse, including sexual violence and harassment. [NSPCC Learning+1](#)
- Domestic abuse.
- Mental health concerns impacting safety or education.
- Online harms including grooming, pornography, cyberbullying, sexting, and exposure to harmful content, misinformation and conspiracy theories. [NSPCC Learning+1](#)
- Radicalisation and extremism (Prevent duty).
- Honour-based abuse, FGM, forced marriage.
- Children missing from or **absent from education**. [NSPCC Learning+1](#)

9.2 Responding to a disclosure or concern

Any adult working at Tree of Life must:

1. **Listen** carefully, remain calm, and take the child seriously.
2. **Explain** that you cannot keep what they say a secret.
3. **Record** factual details as soon as possible (using the provision's agreed recording system).
4. **Report** immediately to the **DSL/Deputy DSL**; if in doubt, treat as a safeguarding concern.
5. If at any point there is **immediate risk of significant harm**, contact **police (999)** and/or **local children's social care** immediately (see Section 11).

The DSL will decide, in line with local thresholds, whether to:

- Provide or coordinate **early help**. [GOV.UK+1](#)
- Make a **referral** to children's social care.
- Seek advice from the relevant **Local Authority Designated Officer (LADO)** where the concern relates to an adult in a position of trust.

9.3 Chronology of Events in Child Protection Recording

- When a child protection concern arises, staff must begin a clear chronology from the moment of the initial disclosure or first sign of concern.
- The adult who receives the disclosure must record it **immediately** on CPOMS, specifically linked to an individual pupil's profile.
- The record must include **who** reported the concern, **what** was said or observed, **when** it occurred, and **how** the information was shared.
- The Designated Safeguarding Lead (DSL) reviews the CPOMS entry promptly, adds actions taken, and updates the safeguarding file.
- All subsequent discussions, decisions, referrals, meetings, and outcomes must be recorded to maintain a **continuous, dated chronology**.
- Records must be stored securely within the safeguarding file and monitored to ensure accuracy and compliance.
- In line with statutory requirements, child protection records must be retained **until the young person reaches at least 75 years of age**.
- If ongoing social care involvement or legal proceedings exist, records may need to be retained for longer, following local authority and legal guidance.
- Staff are aware of what must be reported and have regular meetings to be made aware of the procedures to follow in such instances.

10. Peer-on-Peer Abuse

Tree of Life recognises that children can be vulnerable to abuse by their peers. Peer-on-peer abuse can take many forms and should never be passed off as “banter”, “part of growing up”, or “children being children”. All incidents will be taken seriously, addressed promptly, and managed in line with safeguarding legislation and best practice.

10.1 Forms of Peer-on-Peer Abuse

Peer-on-peer abuse may include, but is not limited to, the following:

1. Bullying (Including Cyberbullying)

- Persistent or repeated behaviour intended to cause physical or emotional harm.
- Can include verbal abuse, threats, exclusion, manipulation, and physical intimidation.
- Cyberbullying includes harmful behaviour using digital platforms such as messaging apps, social media, email, or gaming environments.

2. Sexual Harassment

Sexual harassment refers to unwanted conduct of a sexual nature. This can include:

- Sexual comments, jokes, or name-calling.
- Sexualised gestures or behaviour.
- Unwanted or inappropriate physical contact.
- Sharing of sexual images or messages.
- Gender-based bullying or sexist comments.

3. Sexual Violence

Sexual violence includes:

- Any act of physical sexual assault committed by a child against another child.
- Rape, assault by penetration, or sexual assault as defined in UK law.

4. Harmful Sexual Behaviour (HSB)

Behaviour that is:

- Developmentally inappropriate,
- Sexually aggressive,
- Exploitative, coercive, or violent,
- Or poses a risk of harm to the individual or others.
This includes both offline and online behaviours, such as sharing explicit

images (“sexting”), coercing peers to engage in sexual activities, or frequent sexualised behaviours beyond developmental norms.

10.2 Culture and Prevention

Tree of Life is committed to:

- Promoting a culture where respectful relationships are modelled and reinforced.
- Ensuring pupils understand acceptable and unacceptable behaviours.
- Educating pupils through the curriculum on healthy relationships, consent, online safety, and reporting concerns.

Staff receive training to identify and respond to all forms of peer-on-peer abuse.

10.3 Reporting Peer-on-Peer Abuse

Any member of staff who becomes aware of peer-on-peer abuse must report it immediately to the Designated Safeguarding Lead (DSL).

Reports can come from:

- A child directly
- A friend or peer
- A parent/carer
- Staff observations
- Information shared online or offline

Staff must:

- Never promise confidentiality to a child

- Reassure the child that they will be supported
 - Record the disclosure clearly, factually, and promptly
 - Follow the DSL's direction on next steps
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10.4 Responding to Peer-on-Peer Abuse

The DSL will:

1. Assess the incident, including immediate safety risks.
2. Gather relevant information, speaking to all parties involved where appropriate.
3. Determine the level of response, which may include:
 - Managing within pastoral/safeguarding systems
 - Implementing safety plans
 - Involving parents/carers
 - Referring to external agencies (e.g., Children's Social Care, Police)
 - Engaging specialist support services
4. Ensure that both the victim and alleged perpetrator are safeguarded, supported, and monitored.
5. Record all decisions and actions, with clear rationales on Cpoms and share with relevant services and parents/ carers.

The response will always prioritise the child's welfare and follow statutory guidance.

10.5 Support for Pupils

Tree of Life will ensure:

- Victims are listened to, supported, and protected from further harm.
- Alleged perpetrators are supported in understanding and addressing their behaviour.
- Both parties have access to pastoral care, counselling services, or external support agencies where needed.

Restorative approaches may be used only where appropriate, safe, and supported by safeguarding professionals.

10.6 Recording and Monitoring

- All incidents of peer-on-peer abuse will be recorded within the school's safeguarding system.
- Patterns will be monitored to identify repeated behaviours or wider cultural issues.
- Records will include actions taken, decisions made, and outcomes.

11. Recognising radicalisation and extremism

Tree of Life will:

- **Follow KCSIE and Prevent Duty guidance**, ensuring all staff understand their statutory responsibilities in identifying and responding to radicalisation risks.
- **All staff have regular training** on recognising the signs of radicalisation, extremist narratives, online risks, and the specific vulnerabilities often present within alternative provision settings.
- **Build strong, trusting relationships with learners**, enabling staff to recognise changes in behaviour, attitude, or peer groups that may indicate increased vulnerability.
- **Promote an inclusive, respectful culture** where diversity is valued, harmful attitudes are challenged, and pupils develop a strong sense of belonging.

- **Embed critical thinking, resilience, and media literacy** within the curriculum to help pupils understand and question extremist narratives and misinformation.
- **Monitor attendance, behaviour, and wellbeing closely**, identifying patterns that may suggest grooming, isolation, or exposure to extremist influences.
- **Implement clear safeguarding procedures** so that concerns about radicalisation are reported immediately to the Designated Safeguarding Lead (DSL) and recorded appropriately.
- **Work in partnership with external agencies**, including local authority Prevent teams, social care, and police, to share information and seek specialist guidance when needed.
- **Support families and carers**, offering guidance on online safety, risks of extremism, and how to recognise and respond to concerning behaviours at home.
- **Provide safe spaces for discussion**, allowing pupils to explore sensitive or controversial issues with support, build confidence, and feel heard.
- **Act swiftly and proportionately** when concerns arise, ensuring early intervention and appropriate support for the learner.

12. Children who are especially vulnerable

Tree of Life recognises that some children are at greater risk of harm, including those who:

- Are looked-after, previously looked-after or in kinship care. [NSPCC Learning+1](#)
- Have SEND, communication needs or complex health needs.
- Have experienced exclusion or placement breakdown.
- Have mental health difficulties.
- Are involved in or at risk of exploitation or serious youth violence.
- Identify as LGBTQ+ or face additional barriers because of racism, disability, religion, or other factors.

The therapeutic AP context means many pupils will meet one or more of these categories; the DSL will ensure that risk assessments and support plans reflect this.

13. Mental Health Safeguarding

Tree of Life recognises the strong link between mental health and safeguarding. Children's mental health difficulties may be both a **cause and consequence** of abuse, trauma, exploitation, or neglect. The school is committed to ensuring that pupils' emotional wellbeing is monitored, supported, and responded to as a core element of safeguarding practice.

13.1 Identifying Mental Health Concerns

Staff are trained to understand that mental health difficulties can present in a range of ways. Concerns may be identified through:

- Changes in behaviour, mood, relationships, or attendance
- Signs of anxiety, low mood, or emotional dysregulation
- Self-harm, suicidal ideation, or expressions of despair
- Increased risk-taking behaviour
- Disclosure by a child or concerns raised by peers
- Changes in presentation linked to trauma or adverse childhood experiences
- Difficulties with sleep, eating, concentration, or engagement in learning
- Impact of online harm, bullying, exploitation, or home circumstances

Staff do **not** need to make a diagnosis; they need only recognise emerging concerns and report them promptly.

13.2 Reporting Mental Health Concerns

All mental health concerns—whether early signs or significant risks—must be reported through the school's safeguarding processes:

- **Immediate concerns** should be reported directly to the **Designated Safeguarding Lead (DSL)** or deputy.
- Staff must record the concern **promptly and factually**, noting:
 - Observations or disclosures
 - Context
 - Any immediate risks

- *Urgent risk of harm*, including suicidal intent or severe distress, should be treated as a **safeguarding emergency**, with immediate escalation to the DSL.

Where a child is already open to mental health services, staff should ensure this is noted so information can be appropriately shared.

13.4 Responsibility for Follow-Up

The **DSL** holds overall responsibility for follow-up and ensuring concerns are managed appropriately. This includes:

- Assessing the level of risk
- Deciding whether the concern meets a threshold for Early Help, CAMHS referral, or statutory safeguarding intervention
- Coordinating communication with parents/carers where appropriate
- Liaising with external agencies
- Ensuring a support plan or risk management plan is put in place
- Monitoring the child's wellbeing over time

The DSL may work closely with:

- The mental health lead (if applicable)
- SENCO
- Therapeutic practitioners
- Pastoral staff
- External professionals

Where concerns escalate or do not improve, the DSL will arrange a multi-agency response.

13.5 Links to CAMHS, Early Help, and External Services

Tree of Life recognises the expertise of external mental health and safeguarding agencies. The DSL may:

- Refer a pupil to **Child and Adolescent Mental Health Services (CAMHS)** for assessment or therapeutic support
- Initiate **Early Help** to provide family-based or multi-agency support
- Liaise with **GPs**, social workers, youth services, or crisis teams
- Work with specialist services supporting trauma, bereavement, sexual harm, or exploitation
- Ensure information is shared appropriately in line with statutory safeguarding guidance

Where a child is at immediate risk of serious harm due to mental health concerns, the DSL will escalate to **Children's Social Care** or **emergency services** as required.

13.6 Creating a Mentally Healthy and Protective Environment

Tree of Life ensures that:

- The curriculum promotes emotional literacy, resilience, and help-seeking
- Staff model supportive, trauma-informed practice
- Pupils know how to seek help and who they can talk to
- Reasonable adjustments and wellbeing supports are in place for children with identified needs
- Safe spaces, therapeutic interventions, or adaptations are provided where helpful

Our therapeutic AP environment prioritises relational safety, understanding that mental health and safeguarding must be addressed holistically.

14. Online safety, filtering and monitoring

Tree of Life will:

- Provide a **curriculum and therapeutic programme** that builds digital resilience and safe online behaviour.

- Ensure appropriate **filtering and monitoring systems** are in place for all devices and networks, in line with KCSIE expectations (including for staff). [NSPCC Learning+1](#)
- Include online safety in staff training, including emerging risks such as **misinformation, disinformation, conspiracy theories** and unsafe use of **AI tools**. [NSPCC Learning](#)
- Have clear rules on staff use of personal devices, cameras and social media when working with pupils.

15. Allegations against staff, volunteers and those in positions of trust

This section covers concerns that an adult has:

- Behaved in a way that has harmed, or may have harmed, a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that **indicates they may not be suitable to work with children**, including behaviour outside of work. [GOV.UK+1](#)

Tree of Life will:

- Report all such concerns **immediately** to the **Headteacher/Principal** (or to the Proprietor if the concern is about the Headteacher).
- Contact the relevant **LADO** within **one working day**, in line with local procedures. [greatermanchesterscp.trixonline.co.uk+2Rochdale Borough Council+2](#)
- Cooperate fully with multi-agency **allegations management procedures** for Rochdale and Oldham. [rochdalesafeguarding.com+1](#)

15.1 Low-level concerns

Low-Level Concerns About Staff

Tree of Life will operate a clear and robust system for recording, reviewing, and retaining **low-level concerns** about staff, in accordance with *Keeping Children Safe in Education (KCSIE)* and guidance from **NSPCC Learning**. This approach supports early identification of emerging patterns, promotes transparency, and helps maintain a safe and open culture.

What Counts as a Low-Level Concern?

A **low-level concern** is any concern—however minor—that an adult working with children may have acted in a way that is:

- **Inconsistent with the staff code of conduct**, including inappropriate boundaries or behaviours.
- **Inconsequential on its own**, but may indicate a pattern if repeated.
- **Not serious enough** to meet the threshold for harm or referral to the LADO, but **causes the person raising it to feel uneasy**.

Examples include (but are not limited to):

- Being overly familiar with a child or having “favourites”.
- Using inappropriate language or making unsuitable comments.
- Having unprofessional physical contact.
- Socialising with children outside of professional boundaries.
- Breaches of professional or safeguarding expectations that fall short of harm.
- Poor judgement that could be misconstrued or raise concerns if repeated.

A single low-level concern does *not* imply misconduct, but recording such concerns supports a culture of professional accountability and safety.

15.2 Who Low-Level Concerns Should Be Reported To

All low-level concerns must be reported **as soon as possible** to one of the following:

- **Headteacher / Proprietor**
- **Designated Safeguarding Lead (DSL)**

If the concern relates to the **Headteacher/Proprietor**, the concern should be reported directly to the **LADO**.

Staff must never ignore safeguarding concerns, even when they appear minor.

15.3 How Low-Level Concerns Are Recorded, Stored, and Monitored

Tree of Life will maintain a **secure, confidential recording system** for documenting low-level concerns. This system will:

- Record the **date, details** of the concern, **context**, and **people involved**.
- Include a **clear rationale** for any actions taken or decisions made.
- Be **separate from general staff personnel files**, but accessible to senior safeguarding leaders.
- Comply with **data protection requirements** and retention schedules.

15.4 Monitoring:

- Records will be reviewed **regularly** by the DSL and Headteacher/Proprietor.
- Patterns or repeated concerns will be identified and evaluated.
- Emerging patterns may result in further action such as training, supervision, or escalation to the **LADO** if thresholds are met.
- A culture of openness, reflection, and professional accountability will be actively promoted.

This system ensures that safeguarding is proactive, transparent, and responsive—reinforcing a safe environment for children and a clear, fair process for staff and aligns to safer working practices and KCSIE 2024 guidelines.

16. Information sharing, confidentiality and record-keeping

Tree of Life recognises that **safeguarding concerns override normal confidentiality** where necessary to protect a child.

- Staff must never promise to keep secrets.
- The DSL will ensure that **chronologies and records** are kept securely, separate from main pupil files, with controlled access.
- When pupils move school or provision, the DSL will ensure **timely transfer** of safeguarding files to the new DSL, with confirmation of receipt. [GOV.UK+1](#)

All information sharing will follow **Working Together**, KCSIE and applicable data protection law. [GOV.UK+1](#)

Tree of Life adheres to all requirements of the **UK GDPR and Data Protection Act 2018**, ensuring that personal information is collected, stored, and processed lawfully, fairly, and securely. Safeguarding information is always handled on a **strict need-to-know basis**, with access limited to those who require it to fulfil their professional responsibilities. While wherever possible we seek the consent of parents/carers and pupils before sharing information, staff must and will share relevant information **without consent** if doing so is necessary to protect a child from risk of harm, or if seeking consent may place the child at increased risk. Information shared externally—to safeguarding partners, local authorities, Children’s Social Care, the Police, CAMHS, or other educational or therapeutic providers—is done in line with statutory guidance, ensuring that it is **accurate, proportionate, timely, and only shared with authorised professionals** for legitimate safeguarding purposes. All such sharing is recorded, with clear rationales for decisions and actions taken.

Tree of Life holds an additional attendance policy and GDPR policy. Please refer to these for more specific information on attendance and GDPR in regards to recording, monitoring and data sharing.

17. Whistleblowing and Staff Safety

Tree of Life is committed to fostering an open, transparent, and safe culture in which all staff feel confident to raise concerns without fear of negative consequences. This includes concerns relating to:

- Poor or unsafe practice
- Suspected wrongdoing or misconduct
- The handling of safeguarding or child protection concerns

Staff have a professional duty to raise such concerns at the earliest opportunity. Concerns can be raised through the following routes:

Internal Reporting Routes

- **Designated Safeguarding Lead (DSL)**
- **Headteacher / Proprietor**

All concerns raised internally will be taken seriously, investigated appropriately, and managed sensitively.

External Reporting Routes

If a staff member feels unable to raise an issue internally, or believes their concern has not been addressed appropriately, they may report directly to:

- **Local Authority Designated Officer (LADO)**
- **Relevant external agencies**
- **Whistleblowing helplines**, including:
 - Local authority safeguarding helplines
 - **NSPCC Whistleblowing Advice Line**
 - Sector support services such as **uksocialcare.com**

Protection From Victimisation and Reprisal

Tree of Life is committed to ensuring that no member of staff is subjected to **victimisation, discrimination, or any form of disadvantage** as a result of raising a genuine concern.

This includes protection from:

- Unfair treatment or dismissal
- Bullying, harassment, or intimidation
- Any adverse impact on training, promotion, or work allocation

Raising a concern in good faith will never lead to disciplinary action. Staff are encouraged to seek advice if they are unsure whether to raise an issue, and support will be provided throughout the process.

18. Local safeguarding contacts – Rochdale & Oldham

You should check these regularly as numbers and emails can change.

18.1 Rochdale

Children's Social Care – to report a child at risk

- **Daytime (Mon–Fri, 8:30am–4:45pm):** 0300 303 0440
- **Out of hours:** 0300 303 8875 [Rochdale Borough Council+1](#)

Children's Social Care address

Children's Social Care,
Floor 4, Number One Riverside,
Smith Street, Rochdale OL16 1XU [Rochdale Borough Council](#)

Early Help / Safeguarding Hub

The Complex Early Help and Safeguarding Hub (EHASH)

- **Tel:** 0300 303 0440
- **Email:** ehash@rochdale.gov.uk greatermanchesterscp.trixonline.co.uk

Local Authority Designated Officer (LADO) – Rochdale

- **Named LADO:** Louise Hurst
- **Tel (LADO / Safeguarding Children Unit):** 0300 303 0350 or 0300 3030 350 (as listed in local contacts) greatermanchesterscp.trixonline.co.uk+1
- **Email:** lado@rochdale.gov.uk [Rochdale Borough Council+1](#)

Rochdale Borough Safeguarding Children Partnership (RBSCP)

- **Tel:** 01706 927700
 - **Email:** rbsb.admin@rochdale.gov.uk
 - **Website:** rochdalesafeguarding.com greatermanchesterscp.trixonline.co.uk+1
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18.2 Oldham

Multi-Agency Safeguarding Hub (MASH) – Children's Social Care

- **Tel:** 0161 770 7777

- **Email:** child.mash@oldham.gov.uk
- **Emergency Duty Team (out of hours):** 0161 770 6936 [Oldham Council+1](#)

MASH address

Level 9, Civic Centre,
West Street, Oldham, OL1 1UT [Oldham Council](#)

Local Authority Designated Officer (LADO) – Oldham

- **Named LADO:** Colette Morris
- **Tel:** 0161 770 8870
- **Email:** colette.morris@oldham.gov.uk [greatermanchesterscp.trixonline.co.uk+1](#)

Oldham Safeguarding Children Partnership

- **Website:** Oldham Safeguarding Children Partnership (via oldhamsafeguarding.org / olscb.org). [oldhamsafeguarding.org+2Oldham Council+2](#)

19. Working with placing schools, local authorities and other agencies

As a therapeutic Alternative Provision, Tree of Life will:

- Ensure **clear commissioning agreements** and information sharing with placing schools and local authorities.
- Contribute to and attend **multi-agency meetings** (e.g. CIN, CP, EHCP reviews, PEPs). [GOV.UK+1](#)
- Share timely information on **attendance, engagement, behaviour and risk**.
- Co-create and review **individual risk assessments**, behaviour/therapeutic support plans and safety plans.

20. Curriculum, environment and pupil voice

Tree of Life will:

- Provide a curriculum (including therapeutic sessions) that builds understanding of:
 - Healthy relationships and consent.
 - Online safety.
 - Mental health and emotional regulation.
 - How to seek help and who to talk to. [GOV.UK+1](#)
 - Ensure pupils know **who the DSL team are** and how to approach them.
 - Actively seek and respond to **pupil voice** about safety and wellbeing, including anonymous feedback mechanisms where appropriate.
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21. Policy implementation and review

- This policy will be **reviewed at least annually** and sooner if:
 - There are significant changes to KCSIE, Working Together or other statutory guidance.
 - There are changes to local safeguarding arrangements in Rochdale or Oldham.
 - Learning from serious case reviews or local practice reviews suggests revision. [GOV.UK+2GOV.UK+2](#)
- Any revisions will be approved by the proprietor/board and communicated to all staff, volunteers and relevant partners.

All staff are required to read part 1 of KCSIE annually and sign to confirm their understanding and their role in implementing this.