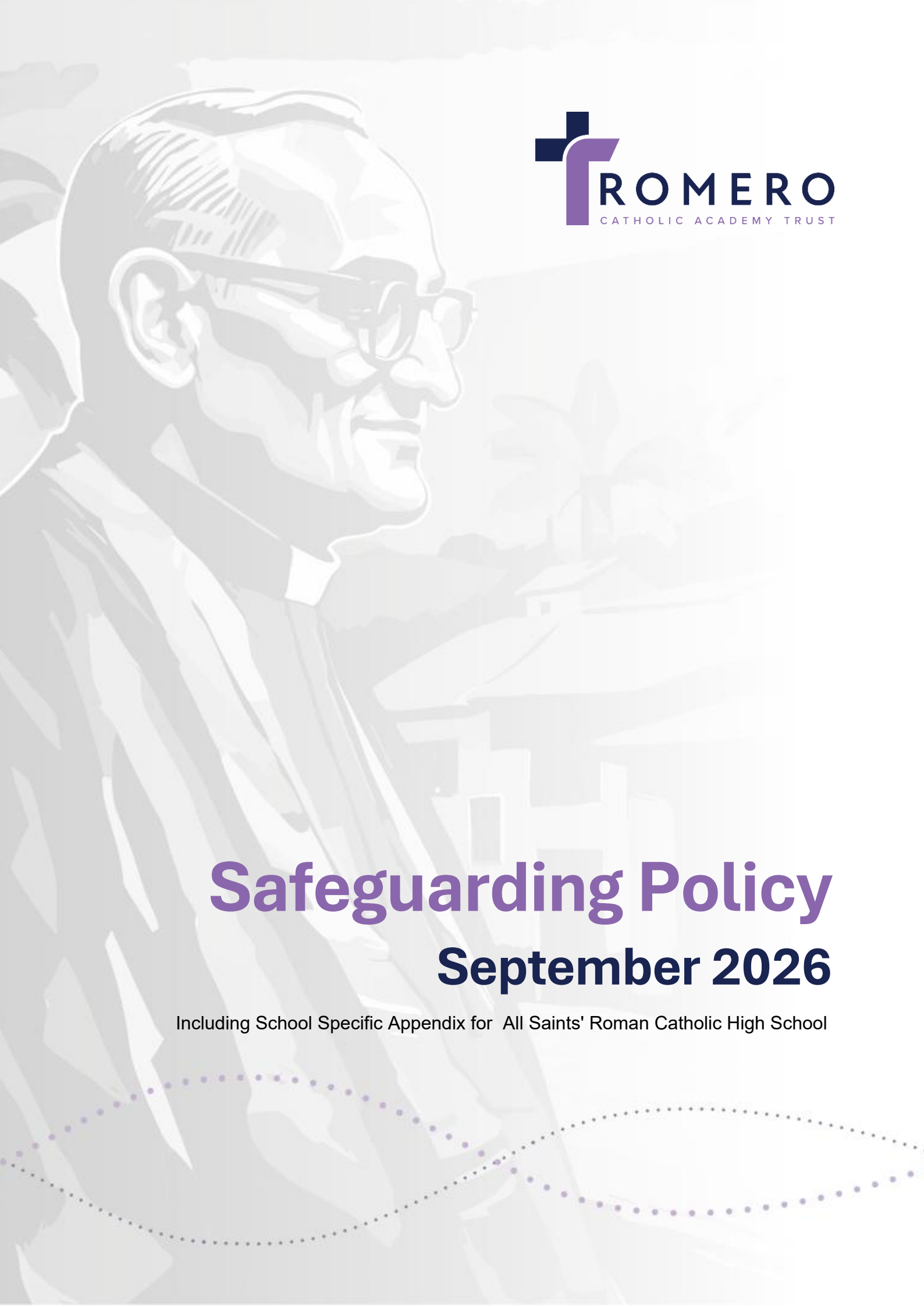


ROMERO
CATHOLIC ACADEMY TRUST

Safeguarding Policy

September 2026

Including School Specific Appendix for All Saints' Roman Catholic High School

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1. GLOSSARY

For this document the following terminology should be considered:

Safeguarding is the overarching term for everything done to support children and young people, keep them safe, and promote their welfare. It encompasses the full spectrum of measures to prevent harm, promote wellbeing, and ensure children are able to achieve their best outcomes.

Keeping Children Safe in Education 2026 defines safeguarding and promoting the welfare of children as:

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

Child protection, as defined in 'Working Together to Safeguard Children (2026)', refers to the activity undertaken to protect individual children who are suffering, or are likely to suffer, significant harm. This includes timely assessment, intervention, and referral to statutory services where necessary.

Safeguarding extends beyond child protection and includes:

- promoting children's health and wellbeing, including mental health;
- preventing harm from all forms of abuse, neglect, exploitation, or radicalisation;
- ensuring online safety and protection from digital risks;
- early identification and support for children with additional needs (early help);
- addressing risks in the wider environment (contextual safeguarding); and
- listening to children's voices and involving them in decisions affecting their welfare.

Staff refers to all those working for or on behalf of the Romero Catholic Academy Trust, full time or part-time, temporary or permanent, in either a paid or voluntary capacity.

DSL refers to the Designated Safeguarding Lead at the School.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example, step-parents, foster carers and adoptive parents.

Extra familial Harm - Extra-familial harm refers to abuse or exploitation occurring outside the family environment. **Contextual safeguarding** refers to the approach used to understand and respond to the wider relationships, environments and circumstances in which such harm occurs.

Family Help refers to support provided to children and families as soon as problems emerge. It includes targeted early help and, where appropriate, statutory support provided to children in need under section 17 of the Children Act 1989.

2.PURPOSE AND INTRODUCTION

This policy establishes Romero Catholic Academy Trust's safeguarding and child protection framework and sets out the minimum safeguarding standards that must be implemented by all schools within the Trust.

Local schools may supplement this policy with local procedures, contacts and operational guidance, but may not remove or weaken any element of this policy.

At Romero Catholic Academy Trust, we are committed to safeguarding children and young people, and we expect everyone who works in our Trust and schools to share this commitment. Adults in our schools take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

All staff working in or on behalf of Romero Catholic Academy Trust including those who do not work directly with children, are expected to read and understand at least Part One of Keeping Children Safe in Education 2026. The Trust will ensure that appropriate arrangements are in place to support staff to understand and discharge their safeguarding responsibilities.

For those schools within Romero who provide education for children aged 0 to 5 through nursery or reception provision, this policy should also be read alongside section 3 of the Early Years Foundation Stage statutory framework.

This policy forms part of Romero CAT's wider safeguarding framework and should be read alongside:

- Romero Catholic Academy Trust Low Level Concerns and Allegations of Abuse Against Staff
- Individual schools Behaviour Policy;
- Romero Catholic Academy Trust Staff Code of Conduct;
- Individual schools E- Safety Policy;
- Department for Education, Keeping Children Safe in Education 2026;
- Department for Education, Working Together to Safeguard Children 2026;
- The Early Years Foundation Stage statutory framework, where applicable; and
- The local safeguarding partners' multi-agency safeguarding arrangements, threshold documents and referral procedures.
- Romero Catholic Academy Trust Restrictive Intervention Policy.

This policy has regard to the following principal legislation:

- Children Act 1989;
- Children Act 2004;
- Children and Social Work Act 2017;
- Education Act 2002;
- Education (Independent School Standards) Regulations 2014;
- Safeguarding Vulnerable Groups Act 2006, as amended;
- Data Protection Act 2018 and UK General Data Protection Regulation;
- Data (Use and Access) Act 2025;
- Children's Wellbeing and Schools Act 2026; and
- Crime and Policing Act 2026.

3.TRUST-WIDE SAFEGUARDING GOVERNANCE AND ACCOUNTABILITY

Safeguarding and promoting the welfare of children is the responsibility of everyone within the Trust. The Trust operates a whole-trust approach to safeguarding in which strategic oversight, operational leadership and local accountability work together to ensure the safety and welfare of all pupils.

The Romero Catholic Academy Trust Board retains overall accountability for safeguarding and child protection arrangements across all schools within the Trust.

The Trust Board will:

- ensure that safeguarding arrangements across Romero Catholic Academy Trust comply with statutory requirements, including Keeping Children Safe in Education and Working Together to Safeguard Children;
- appoint a Director with strategic responsibility for safeguarding;
- receive regular reports regarding safeguarding practice, compliance, training, audit activity and emerging risks across the Trust;
- monitor the effectiveness of safeguarding arrangements and ensure appropriate action is taken where standards are not met;
- adopt and review the Trust Safeguarding and Child Protection Framework;
- ensure sufficient resources are available to support effective safeguarding practice across all academies;
- monitor safeguarding trends and lessons learned arising from internal reviews, safeguarding practice reviews, inspections and audits; and
- ensure safeguarding remains a standing priority within Trust governance arrangements.

The Executive Team is responsible to the Trust Board for ensuring there is a whole-trust approach to pupil and staff wellbeing, inclusion, safeguarding arrangements and child protection. The Executive Team will monitor safeguarding practice across schools, provide support and challenge to school leaders and report regularly to Directors on safeguarding performance and compliance.

Local Governing Bodies provide local scrutiny and assurance and will monitor safeguarding practice within their school through regular reports, visits and safeguarding reviews.

SAFEGUARDING ASSURANCE AND REPORTING

To enable effective oversight of safeguarding arrangements across Romero Catholic Academy Trust, each school will provide an annual safeguarding assurance report to the Trust through the Headteacher and Designated Safeguarding Lead. The report will provide assurance regarding compliance with statutory safeguarding requirements and the effectiveness of safeguarding practice within the school.

The annual report will normally include:

- safeguarding training compliance;
- safeguarding audit outcomes;
- Single Central Record compliance;
- allegations and low-level concerns data;
- child protection and safeguarding trends;
- attendance, suspension and exclusion information relating to vulnerable pupils;
- effectiveness of filtering and monitoring arrangements;
- safeguarding curriculum developments;

- safeguarding priorities for the coming academic year; and
- progress against any safeguarding action plans.

The Trust Head of Safeguarding will provide an annual Trust Safeguarding Report to the Executive Team and Trust Board. This report will identify Trust-wide safeguarding strengths, emerging themes, risks, training needs, compliance matters and strategic priorities.

The Trust Board will use this information to evaluate the effectiveness of safeguarding arrangements across the Trust, provide challenge and support where required, and ensure appropriate action is taken where standards do not meet expectations.

4.STAFF ROLES - SCHOOL SPECIFIC DETAILS CAN BE FOUND IN APPENDIX A

DESIGNATED SAFEGUARDING LEAD (DSL)

Each school within Romero Catholic Academy Trust has a Designated Safeguarding Lead (DSL), who is a substantive member of the School's Senior Leadership Team and has the authority, time, training and resources necessary to fulfil the responsibilities of the role.

During term time, the DSL or an appropriately trained deputy will always be available during school hours for staff to discuss safeguarding concerns. Robust cover arrangements will be maintained during periods of illness, leave or other absence. These arrangements may include a confidential safeguarding mailbox or another secure communication system monitored by appropriately trained DSLs or deputy DSLs.

Appropriate DSL cover will also be available for activities taking place outside normal school hours or during school holidays. Where necessary, availability may be provided remotely by telephone, video call or another secure means of communication.

The DSL:

- is a senior member of the school's leadership team and has the status and authority required to carry out the duties of the role, including committing resources and supporting and directing staff;
- takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes n place at the school;
- is provided with the time, funding, training, resources and support necessary to carry out the role effectively;
- maintains oversight of the school's safeguarding picture and ensures that deputy DSLs have access to the information required to undertake their responsibilities;
- acts as a source of advice, support and expertise to staff on child welfare, safeguarding and child protection matters;
- has a working knowledge of local safeguarding procedures and acts as a point of contact with the safeguarding partners;
- ensures that all staff have access to and understand the school's child protection policy and procedures, with particular attention given to new and part-time staff;
- links with the local safeguarding partner arrangements to ensure staff are made aware of relevant training opportunities and the latest local safeguarding policies and procedures;
- undertakes role-specific training at least every two years, including Prevent awareness training, and refreshes their knowledge and skills at regular intervals and at least annually;
- understands the assessment process for providing Family Help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;

- understands the relevant referral arrangements for child criminal exploitation, child sexual exploitation, trafficking and modern slavery, including the National Referral Mechanism where appropriate;
- makes, or supports staff to make, referrals to local authority children's social care, the police, the Prevent programme and other relevant agencies, as appropriate;
- supports staff throughout the referral and assessment process and ensures that the school provides appropriate information and assistance to children's social care and other agencies;
- keeps safeguarding cases under review and ensures that concerns are reconsidered or escalated where risks increase, the child's circumstances do not improve or the support provided is not meeting the child's needs;
- keeps detailed, accurate, secure and up-to-date records of all safeguarding concerns, discussions and decisions, including the action taken, advice received, outcomes and rationale for making or not making a referral;
- ensures that child protection records are stored securely, accessed only by those who need to see them and managed in accordance with data protection and information-sharing requirements;
- ensures that when a pupil leaves the school, their child protection file is transferred separately from the main pupil file, through secure means, and that confirmation of receipt is obtained;
- ensures that child protection files are transferred within five days of an in-year transfer or within the first five days of the start of a new term;
- considers whether relevant safeguarding information should be shared with a receiving school in advance, particularly where it is needed to assess risk to the child or others and to establish appropriate safety and support arrangements;
- attends and contributes effectively to strategy discussions, child protection conferences, review conferences and other relevant multi-agency meetings;
- coordinates the school's contribution to child protection plans, assessments and other multi-agency safeguarding arrangements;
- liaises as appropriate with the Headteacher, Romero Catholic Academy Trust, the case manager, the LADO, children's social care, the police and other relevant agencies;
- liaises with relevant school staff, including pastoral leaders, the SENCO, attendance staff, IT staff and the senior mental health lead, so that children's needs are considered holistically;
- liaises with the senior mental health lead, the Mental Health Support Team where available, and relevant external services where safeguarding concerns are linked to a child's mental health;
- promotes supportive engagement with parents and carers in safeguarding and promoting children's welfare, unless doing so may place a child or another person at increased risk or compromise an investigation;
- understands the circumstances in which a child is entitled to an Appropriate Adult under Code C of the Police and Criminal Evidence Act;
- works with attendance staff and relevant agencies to identify and respond to safeguarding concerns associated with repeated or prolonged absence from education, making referrals where appropriate;
- works with the Headteacher and relevant strategic leaders to promote the educational outcomes of children who have or have had a social worker;
- promotes a culture in which children are listened to and their wishes and feelings are considered when decisions are made about their safety and welfare;
- ensures that the child protection policy and its implementation are reviewed at least annually and updated regularly in partnership with the governing body or proprietor; and

- ensures that the child protection policy is publicly available and that parents and carers understand the school's role in making safeguarding referrals.

DEPUTY DESIGNATED SAFEGUARDING LEAD (DEPUTY DSL)

The Deputy DSL(s):

- are trained to the same standard as the DSL and receive the same regular safeguarding updates;
- support the DSL in carrying out the safeguarding and child protection responsibilities set out in this policy;
- have access to the safeguarding information and systems necessary to discharge their responsibilities effectively;
- act as a source of advice and support to staff on safeguarding and child protection matters; and
- carry out the necessary functions of the DSL during periods of absence to ensure the ongoing safety and protection of pupils.

Where the DSL is absent for a prolonged period, an appropriately trained Deputy DSL will undertake the day-to-day functions of the role in accordance with the school's agreed cover arrangements.

Although safeguarding duties may be delegated to appropriately trained deputies, the DSL retains ultimate lead responsibility for safeguarding and child protection. This responsibility must not be delegated.

The responsibilities of the DSL and Deputy DSL(s) are clearly set out in the relevant postholders' job descriptions.

THE MULTI-ACADEMY TRUST

Romero Catholic Academy Trust's Head of Safeguarding provides strategic leadership, support and quality assurance for safeguarding across all schools within the Trust and will ensure that:

- Schools appoint a Designated Safeguarding Lead (DSL) who is a member of the senior leadership team and who has undertaken role-specific training;
- The DSL (and Deputy DSL) role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer;
- The DSL, Deputy DSL or a member of Romero Catholic Academy Trust's Education Team is always available during school hours to discuss any safeguarding concerns and that the DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of term school activities;
- Romero Catholic Academy Trust schools follow safer recruitment procedures that include statutory checks on the suitability of staff to work with children;
- A training curriculum is available that ensures all staff, including the headteacher, and volunteers receive appropriate and regular, safeguarding and child protection training and updates as required (at least annually). This includes ensuring that the DSL receives refresher training and regular updates as defined under the DSL's duties above;
- Romero Catholic Academy Trust's Head of Safeguarding and CEO will be responsible for liaising with the Local Authority Designated Officer (LADO) and other agencies in the event of an allegation being made against the headteacher.
- Support and challenge Designated Safeguarding Leads; providing advice regarding complex safeguarding and child protection matters;

- Oversee safeguarding compliance across all schools;
- Monitor safeguarding trends and emerging risks across the Trust;
- Coordinate safeguarding training and professional development;
- Support schools during inspections involving safeguarding;
- Lead or commission safeguarding audits;
- Monitor the implementation of safeguarding action plans;
- Ensure lessons learned from safeguarding reviews are disseminated across all schools;
- Provide safeguarding reports to the Executive Team and Trust Board; and
- Support schools where safeguarding concerns require Trust-level oversight or intervention
- Provide DSLs and Deputy DSLs with access to safeguarding supervision, professional support and reflective practice opportunities, particularly when managing complex, high-risk or traumatic cases.

THE HEADTEACHER WILL:

- Ensure that the child protection policy and associated safeguarding procedures are understood and implemented consistently by all staff;
- Ensure that all staff, including those who do not work directly with children, read and understand at least Part One of Keeping Children Safe in Education 2026 and receive appropriate support to understand their safeguarding responsibilities;
- Allocate sufficient time, funding, training, support and resources, including robust cover arrangements, to enable the DSL and Deputy DSL(s) to carry out their roles effectively, including attending strategy discussions, child protection conferences and other relevant meetings;
- Ensure that appropriate and confidential DSL cover arrangements are maintained during illness, leave, other absence and school activities taking place outside normal school hours;
- Support the designated teacher for looked-after and previously looked-after children to promote the educational achievement of children who are looked after by the local authority, have left care through adoption, special guardianship or child arrangements orders, or were adopted from state care outside England and Wales;
- Ensure that staff have the knowledge, skills and understanding necessary to safeguard and support looked-after and previously looked-after children, children with a social worker and children in kinship-care arrangements;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that concerns are responded to sensitively and in accordance with the Romero Academy's whistleblowing procedures;
- Promote an open and transparent safeguarding culture in which concerns about children and adults are reported, recorded, reviewed and acted upon promptly;
- Ensure that the culture of the school supports effective pastoral care, universal and community-based Early Help and targeted support through Family Help;
- Ensure that staff provide appropriate information and assistance to social workers and other agencies when children's social care becomes involved;
- Ensure that pupils are provided with age-appropriate opportunities throughout the curriculum to learn about safeguarding and how to keep themselves and others safe, including online;
- Ensure that clear roles and responsibilities are assigned for filtering and monitoring and that the effectiveness of the school's filtering and monitoring arrangements is reviewed at least once every academic year by the responsible member of the Senior Leadership Team, supported by the DSL and IT staff or provider, with a record retained of the checks undertaken;

- Ensure that appropriate safeguarding due diligence is undertaken before commissioning alternative provision and that placements, provider arrangements and safeguarding risks are kept under regular review;
- Ensure that allegations or concerns which may meet the harm threshold concerning staff, supply teachers, trainee teachers, volunteers or contractors are reported to the appropriate case manager and discussed with the Local Authority Designated Officer without delay, and within one working day, before any internal investigation is commenced;
- Ensure that low-level concerns about adults working in or on behalf of the school are reported, recorded and managed in accordance with Romero Catholic Academy's Low-Level Concerns and Allegations of Abuse Against Staff
- Ensure that referrals are made to the Disclosure and Barring Service as soon as possible where the statutory referral criteria are met, including where a member of staff or volunteer is removed from regulated activity or leaves before they can be removed;
- Ensure that referral to the Teaching Regulation Agency is considered where a teacher has been dismissed, or would have been dismissed had they not resigned, because of serious misconduct;
- Ensure that relevant staff are made aware of the requirements of the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Regulations 2018, including their responsibility to disclose relevant information;
- Ensure that safeguarding policies, procedures and practice are reviewed regularly and updated in response to changes in statutory guidance, legislation, local arrangements, emerging risks and lessons from safeguarding incidents; and
- Provide the Local Governing Body with sufficient information and assurance to enable it to scrutinise the effectiveness of the school's safeguarding arrangements and confirm that those arrangements are implemented in practice.

THE LOCAL GOVERNING BODY WILL:

- Identify a named individual to take responsibility for oversight of the school's safeguarding arrangements. This colleague will maintain regular contact with the DSL and will ensure that the schools Local Governing Body receives regular reports about safeguarding activity at the school.
- Ensure that the school's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.

5.SAFEGUARDING CULTURE

Romero Catholic Academy Trust and its schools are committed to creating and maintaining a strong safeguarding culture in which:

- Safeguarding is everybody's responsibility;
- Children are listened to and taken seriously;
- Concerns are shared promptly;
- Professional curiosity is actively encouraged;
- Challenge and escalation are welcomed;
- Staff feel confident to raise concerns;
- Low-level concerns are identified and addressed;
- Learning from safeguarding incidents strengthens future practice; and
- Safeguarding considerations are embedded within all decision-making.

All staff should maintain an attitude of "it could happen here" and should never assume that somebody else has taken action.

6.ALLEGATIONS AND SAFEGUARDING CONCERNS ABOUT STAFF OR VOLUNTEERS

This section applies to concerns or allegations about any adult working in or on behalf of Romero Catholic Academy Trust, including members of staff, supply teachers, trainee teachers, volunteers and contractors.

- All concerns about adults, no matter how small, must be reported without delay and managed in accordance with this policy and Romero Catholic Academy's Low-Level Concerns and Allegations of Abuse Against Staff

Concerns and allegations will be considered under one of the following procedures:

- Concerns or allegations that may meet the harm threshold; or
- Concerns or allegations that do not meet the harm threshold, referred to as low-level concerns.

Where a concern relates to a supply teacher, trainee teacher, contractor or another person provided by a third-party organisation, the school and the relevant agency, employer or training provider share safeguarding responsibilities. The school will take the lead in protecting children, establishing the immediate facts and managing the safeguarding process. The agency, employer or training provider will normally lead any related employment, disciplinary or training process.

The school will not cease to use the services of a supply teacher, trainee teacher or contractor solely as an alternative to properly considering and managing a safeguarding concern or allegation. KCSIE 2026 expressly extends Part Four to trainee teachers and clarifies the shared responsibilities between schools and third-party organisations.

A CONCERN OR ALLEGATION MAY MEET THE HARM THRESHOLD WHERE AN ADULT HAS:

1. Behaved in a way that has harmed a child, or may have harmed a child;
2. Possibly committed a criminal offence against or related to a child;
3. Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children;

A referral will be made to the LADO[1], without delay.

The final criterion includes behaviour that may have occurred outside the school and which may indicate that the individual is unsuitable to work with children. This is sometimes referred to as transferable risk.

Staff must share, without delay, any concern or allegation that may meet the harm threshold with the Headteacher.

A "case manager" will lead any investigation. This will be either the Headteacher, a delegated senior leader, or, where the Headteacher is the subject of an allegation, Head of safeguarding, CEO or member of the Executive Team of Romero Catholic Academy Trust.

[1] Contact details can be found in Appendix A of this policy.

The case manager will undertake only those initial enquiries necessary to establish the basic facts. No substantive internal investigation will begin until advice has been sought from the LADO.

Where a concern relates to a supply teacher, trainee teacher, contractor or another person provided by a third-party organisation, the relevant agency, employer or training provider will be informed and involved in the process.

Where the concern or allegation relates to the Headteacher, it must be reported without delay to the Head of Safeguarding and CEO of Romero Catholic Academy Trust.

Where colleagues are unsure whom to report a concern to, believe that the concern has not been dealt with appropriately or consider that there may be a conflict of interest, they may contact the LADO directly.

Concerns about the Chair of the Governing Body, Chair of Board of Directors or a member of the Central Team must be reported in accordance with Romero Catholic Academy Trusts Low Level Concerns and Allegations of Abuse Against Staff policy and, where appropriate, directly to the LADO.

ALLEGATIONS OR SAFEGUARDING CONCERNS THAT DO NOT MEET THE HARM THRESHOLD: LOW-LEVEL CONCERNS

As part of our whole-trust approach to safeguarding, we promote an open and transparent culture in which all concerns about adults working in or on behalf of Romero Catholic Academy Trust are reported, recorded and dealt with promptly and appropriately.

The term low-level concern does not mean that the concern is insignificant. A low-level concern is any concern, no matter how small, including a sense of unease or a “nagging doubt”, that an adult working in or on behalf of Romero Catholic Academy Trust may have:

- acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside work; and
- not behaved in a way that meets the harm threshold.

Examples of such behaviour could include, but are not limited to:

- being overfriendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone, contrary to School policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door without a legitimate reason;
- humiliating pupils;
- using inappropriate language towards children; or
- failing to maintain appropriate professional boundaries.

Low-level concerns may arise through a concern raised by a child, parent, member of staff or another adult, an observation of an adult’s behaviour, information identified through safeguarding or recruitment checks, or a self-referral by the adult concerned.

The Headteacher will be the ultimate decision-maker in relation to low-level concerns, although advice may be sought from the DSL, Human Resources or the LADO where appropriate.

Where there is any doubt about whether a concern is low-level or may meet the harm threshold, advice will be sought from the LADO.

Where a low-level concern relates to the Designated Safeguarding Lead, it must be reported directly to the Headteacher.

ALLEGATIONS OR LOW-LEVEL CONCERNS RELATING TO THE HEADTEACHER

If the allegation or concern relates to the Headteacher/Principal, it should be reported, without delay, to the Chief Executive of Romero Catholic Academy Trust.

- Concerns about a member of the Central Team must be directed to the Chief Executive Officer
- Concerns about the Chief Executive Officer must be directed to the Chair of the Trust Board
- Concerns about the Chair of Trust Board must be directed to the Vice-Chair of the Trust Board and, where appropriate, to the LADO.

All low-level concerns will be recorded in writing and retained securely. Records will include details of the concern, the context in which it arose, the decision reached, the reasons for that decision and any action taken.

Low-level concerns will be reviewed periodically to identify any patterns of inappropriate or concerning behaviour. Where a pattern is identified, the school will consider whether the matter should be managed under disciplinary procedures, whether the harm threshold may be met, whether the LADO should be consulted, or whether wider policy, practice, culture or training issues need to be addressed.

7. STAFF TRAINING

All staff, including those who do not work directly with children, will read and understand Part One of Keeping Children Safe in Education 2026. A copy of Part One and Romero Catholic Academy' Trust's relevant safeguarding policies will be provided to all staff as part of their induction.

All staff will receive appropriate safeguarding and child protection training, including online safety, at induction. This training will be regularly updated. Staff will also receive safeguarding and child protection updates throughout the year, as required, and at least annually.

All staff will undertake safeguarding training each September, covering as a minimum:

- The roles and responsibilities of all staff in safeguarding and promoting the welfare of children;
- The identity and role of the DSL and Deputy DSL(s), and the school's procedures for reporting and escalating concerns;
- The signs and indicators of abuse, neglect, exploitation and modern slavery, including an understanding that safeguarding concerns frequently overlap;
- The local procedures and criteria for universal and community-based Early Help, targeted early help through Family Help, section 17 children-in-need services and section 47 child protection intervention;
- How to respond when a child discloses abuse, neglect or exploitation, including confidentiality and appropriate information sharing;
- The school's safeguarding response to children who are absent from education, particularly where absence is repeated or prolonged;
- The school's Behaviour Policy and Staff Code of Conduct;
- Allegations and safeguarding concerns about adults, including low-level concerns, transferable risk and whistleblowing arrangements;
- Child-on-child abuse, including harmful sexual behaviour, sexual harassment, sexual violence, misogyny, misandry, serious physical violence and threats involving weapons;

- Child sexual exploitation, child criminal exploitation, county lines, trafficking and modern slavery;
- Recognising and responding to concerns relating to female genital mutilation, forced marriage and honour or faith-based abuse;
- Recognising and responding to concerns relating to radicalisation and the prevent duty;
- Online safety, including the schools's filtering and monitoring systems, generative artificial intelligence, deepfakes, harmful online content and the making or sharing of nudes and semi-nudes, including ai-generated images; and
- Mental health concerns that may also be safeguarding concerns, including self-harm, eating disorders, suicidal ideation and suicide risk

All staff will be made aware that some children may face additional barriers to recognising or reporting abuse or may be at greater risk of harm. This includes children with special educational needs or disabilities, children with medical conditions, looked-after and previously looked-after children, children with a social worker, young carers, children who are pregnant or are parents themselves, and children who experience repeated suspension, classroom removal, part-time timetables or prolonged absence from education.

The school will ensure that staff understand their individual responsibilities in relation to filtering and monitoring and know how to report concerns arising from the use of technology. Online safety will be treated as an integral part of safeguarding and will be included within relevant staff training and updates.

Staff will be required to confirm that they have received, read and understood the relevant safeguarding guidance, policies and training. The school will provide additional training, guidance or support where a member of staff requires further help to understand or discharge their safeguarding responsibilities.

Volunteers will receive safeguarding induction and training appropriate to their role, their level of contact with children and the responsibilities they undertake.

The DSL and Deputy DSL(s) will undertake formal role-specific training at least every two years. This will include up-to-date information about local safeguarding partner arrangements, assessment and referral processes, Family Help, statutory intervention and relevant multi-agency procedures.

In addition, the DSL and Deputy DSL(s) will refresh their knowledge and skills at regular intervals, and at least annually, to keep up to date with developments relevant to their role. They will be supported to access inter-agency training and continuing professional development.

Governors and Directors will receive appropriate safeguarding and child protection training, including online safety, at induction. This training will be updated regularly and, as an school requirement, at least annually, to enable governors and Directors to provide effective strategic challenge and assurance regarding the school's safeguarding arrangements. This will be managed through governor hub and will be supported by Romero's Governance Professional.

8.SAFEGUARDING QUALITY ASSURANCE

Romero Catholic Academy Trust recognises that effective safeguarding requires continuous monitoring, evaluation and improvement.

The Executive Team, Head of Safeguarding and local leaders will undertake quality assurance activities including:

- Safeguarding audits;

- Single Central Record audits;
- Safeguarding file audits;
- Training compliance reviews;
- Safeguarding culture reviews;
- Policy compliance checks;
- Pupil voice activities;
- Attendance and vulnerability reviews;
- Reviews of suspensions, exclusions and attendance data;
- Reviews of child-on-child abuse incidents;
- Reviews of allegations and low-level concerns; and
- Review of safeguarding arrangements within alternative provision.

Following any audit or review, an action plan will be produced where necessary. Progress against identified actions will be monitored and reported through local and Trust governance structures

9.SAFER RECRUITMENT

Romero Catholic Academy Trust complies with the requirements of Keeping Children Safe in Education 2026 and the arrangements of the local safeguarding partners. We operate safer recruitment procedures to help deter, reject or identify people who may pose a risk of harm to children.

Romero Central Team (for central team appointments) and schools will carry out all required pre-appointment checks and will verify, as appropriate, an applicant's identity, right to work in the UK, qualifications, employment history, references, mental and physical fitness, criminal record information and suitability to work with children.

- At least one member of each recruitment panel will have completed safer recruitment training.
- written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked will be obtained.
- Trainee teachers will be checked by the training provider, from whom written confirmation will be obtained.
- Romero Catholic Academy Trust and its schools maintain single central records of recruitment checks undertaken.
- Romero Catholic Academy Trust will not knowingly allow a barred person to engage in regulated activity with children.
- Where a trainee teacher is fee-funded, the training provider will be responsible for undertaking the required checks. The host school will obtain written confirmation that the checks have been completed and that the trainee has been judged suitable to work with children.

The Headteacher will ensure that relevant staff are made aware of the requirements relating to disqualification under the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Regulations 2018, including their obligation to disclose relevant information.

VOLUNTEERS

All volunteer roles will be assessed before the individual begins work. The school will determine whether the role amounts to regulated activity and what checks are required.

From 1st September 2026, a volunteer who teaches, trains, instructs or supervises children frequently, on more than three days in any 30-day period, or overnight, will be regarded as engaging in regulated activity,

even where they are supervised. In these circumstances, the school will obtain an enhanced DBS check with children's barred-list information before, or as soon as practicable after, the volunteer begins the role.

A volunteer will not undertake regulated activity until their children's barred-list status has been confirmed.

The school will review the roles of existing volunteers to identify any individual who becomes engaged in regulated activity because of the changes introduced from 1 September 2026. Where this applies, the school will check the individual's children's barred-list status and obtain the appropriate DBS check.

Where a volunteer meets the frequency requirement through volunteering across more than one school or setting, the school will work with the other settings to determine which organisation will obtain the enhanced DBS check with children's barred-list information.

Where a volunteer is not engaged in regulated activity, the school will undertake and record a written risk assessment to determine what checks, if any, are appropriate.

The assessment will take account of:

- The nature of the work with children;
- The level and frequency of contact with children;
- What is known about the volunteer, including information provided by staff, parents, referees or other volunteers;
- Whether the individual undertakes other paid or voluntary work where a referee can comment on their suitability; and
- Whether an enhanced DBS check without barred-list information, or another level of check, is appropriate.

Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or permitted to undertake regulated activity.

Where the statutory criteria are met, the school will make a referral to the Disclosure and Barring Service in relation to a volunteer who is removed from regulated activity, or who ceases volunteering before they can be removed.

THIRD-PARTY STAFF (CONTRACTORS)

The school will ensure that contractors and other third-party staff working on the premises have undergone the appropriate checks for the work they will undertake.

Where a contractor will engage in regulated activity, an enhanced DBS check with children's barred-list information will be required.

Where a contractor will not engage in regulated activity but will have the opportunity for regular contact with children, an enhanced DBS check without barred-list information may be required.

Where a contractor has not undergone the appropriate checks, they will not be permitted to work unsupervised or undertake regulated activity while children are present.

The school will:

- Obtain written confirmation from the contractor's employer that the appropriate checks have been completed;
- Check the identity of contractors and third-party staff when they arrive at the school; and
- Ensure that the individual presenting for work is the same person on whom the checks were completed.

Where a self-employed contractor is engaged, the school will obtain the appropriate check directly or verify that the individual holds a suitable and eligible check at the required level.

Where the school directs a pupil to attend alternative provision, it will obtain written assurance that adults working with pupils have undergone the appropriate safer recruitment checks. This assurance does not remove the school's responsibility to undertake its own safeguarding due diligence and keep the placement under review.

SITE SECURITY AND VISITORS

Visitors to the school, including contractors, will be required to sign in and will be issued with an identification badge confirming that they have permission to be on the premises.

Parents and carers who are only delivering or collecting their children will not normally be required to sign in.

All visitors are expected to comply with Romero Catholic Academy Trust's safeguarding, conduct and health and safety requirements.

For visitors attending in a professional capacity, the school will check their identity and obtain assurance that the appropriate checks have been completed by their employer, where relevant. The school will not normally ask to see the DBS certificate itself where satisfactory written assurance has been provided.

The school will not request DBS or barred-list checks for visitors such as children's relatives attending sports days, performances or similar events where those checks are not legally permitted or necessary.

The Headteacher will exercise professional judgement when deciding whether a visitor should be escorted or supervised while on the premises, taking account of the nature and purpose of the visit, the visitor's level of contact with children and any checks that have been completed.

THE SINGLE CENTRAL RECORD

Our Single Central Record[2] covers the following people: all staff, including teacher trainees on salaried routes, agency, third-party supply staff who work at the school, volunteers and governors. Details for directors and members will be available via the Romero Central Team SCR on the Romero Portal.

Our Single Central Record is recorded in such a way that allows for details of each individual school to be provided separately, and without delay, to those entitled to inspect that information, including by inspectors.

10.EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

[2] Romero Catholic Academy Trust maintains a record of pre-appointment checks carried out in each school within the CAT, referred to in the Regulations as the register and more commonly known as the 'single central record'. This also includes members and trustees of the Catholic Academy Trust.

All extended and off-site activities will be subject to appropriate health, safety and safeguarding risk assessments.

Where activities are provided and managed by the school, this child protection policy and the school's safeguarding procedures will apply.

Where another organisation delivers services or activities on the schools premises, we will satisfy ourselves that appropriate safeguarding arrangements are in place, including suitable child protection policies, safer recruitment procedures and clear arrangements for sharing concerns. These requirements will be included within any transfer of control agreement, and failure to comply may result in the arrangement being terminated. The school will have regard to Keeping Children Safe in Out-of-School Settings.

Where a pupil attends off-site or alternative provision, the school will remain responsible for safeguarding and will undertake its own due diligence, including where the provider appears on a local authority approved list. We will:

- Record the provider's address and details of any subcontracted provision or satellite sites;
- Obtain assurance that appropriate safeguarding and safer recruitment checks have been completed;
- Require the provider to notify the school of any changes that may affect a pupil's safety, including relevant staffing changes;
- Maintain effective communication with the provider; and
- Review the placement at least half-termly, or immediately where a safeguarding concern arises.

Where safeguarding arrangements are not satisfactory, the school alongside Romero Catholic Academy Trust's Head of Safeguarding will take appropriate action, which may include suspending or ending the placement.

Where an unregistered provider is used, we will undertake additional checks to assure ourselves that appropriate safer recruitment arrangements are in place. This will include requiring the provider, where this has not already been completed, to obtain confirmation from the Teaching Regulation Agency that any person undertaking teaching work is not subject to a prohibition order or other relevant restriction.

Whenever pupils take part in day trips, residential visits, work experience or other off-site activities, robust safeguarding arrangements will be in place.

11.SPORT, TOILETS, CHANGING FACILITIES AND SHOWERS

The school will manage participation in sport and the use of toilets, changing rooms and showers in accordance with Keeping Children Safe in Education 2026, the Equality Act 2010, the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

Where the nature of a sport means that physical strength, stamina or physique creates a safety or competitive disadvantage, pupils may be grouped according to biological sex. Where single-sex provision is necessary for safety, no exceptions will be made. In other circumstances, requests concerning participation will be considered individually, taking account of safety, fairness, the welfare and best interests of the child and other children, and the school's equality and human rights duties.

The school will provide separate toilet facilities for boys and girls where required by law. Pupils will not use toilets designated for the opposite biological sex. Where a pupil does not wish to use the facilities designated for their biological sex, the school will consider whether a suitable self-contained individual

facility can be provided without compromising the safety, privacy, comfort or dignity of that pupil or any other child.

Pupils aged 11 or over at the start of the school year will not be required or permitted to undress in front of pupils of the opposite biological sex and will not use changing or shower facilities designated for the opposite sex. Where necessary, the school will consider an alternative fully enclosed facility or use of the facilities at a different time.

Any individual arrangements will be clearly recorded, communicated to relevant staff on a need-to-know basis and reviewed regularly.

12. RESIDENTIAL VISITS AND SLEEPING ARRANGEMENTS

All residential visits, exchanges, sports tours, camps and other overnight activities will be subject to a documented safeguarding and educational-visits risk assessment.

Children will not share overnight accommodation with children of the opposite biological sex. This applies to shared bedrooms, dormitories, tents and other communal sleeping arrangements.

Where a child does not wish to share accommodation with children of the same biological sex, the school will consider whether suitable separate accommodation can reasonably be provided. Any alternative arrangement must preserve the safety, privacy, comfort and dignity of the child and all other children.

Sleeping arrangements will be agreed and documented before departure and will not be changed informally by individual staff during the visit. Any safeguarding concern arising during a residential activity will be reported to the visit leader and DSL without delay.

13.REASONABLE FORCE AND RESTRICTIVE INTERVENTIONS

There are limited circumstances in which staff may use reasonable force to safeguard a child or another person. Any force used must be no more than is necessary and must be used for the least amount of time.

The school will not operate a blanket “no contact” policy, as this could prevent staff from appropriately supporting or protecting pupils. Decisions about physical contact or reasonable force will be based on professional judgement, the law and the individual circumstances.

Additional care will be taken where an incident involves a child with special educational needs or disabilities, a mental health need or a medical condition. Staff will consider the child’s additional vulnerability, any reasonable adjustments required and Romero Catholic Academy Trust’s Public Sector Equality Duty.

Positive and proactive support, including individual behaviour or risk-reduction plans agreed with parents or carers where appropriate, will be used to reduce the likelihood that restrictive intervention becomes necessary.

Any use of reasonable force or restrictive intervention will be recorded and reviewed in accordance with Romero Catholic Academy Trust’s Restrictive Intervention Policy and the schools behaviour policy. Where an incident raises a concern about possible abuse, inappropriate practice or harm to a child, it will also be managed under this child protection policy.

14.TEACHING OUR PUPILS ABOUT SAFEGUARDING

At Romero Catholic Academy Trust pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

A summary of the curriculum can be found in Appendix B

Romero Catholic Academy Trust uses data and local information to respond to emerging safeguarding concerns and schools will adapt their teaching to respond to this. Additional lessons, assemblies or interventions will be put in place to respond to an evident or emerging concern.

15.EDUCATIONAL OUTCOMES

The DSL will work with the Headteacher, the designated teacher and relevant strategic leads to promote the educational outcomes of children who have, or have had, a social worker.

The DSL will understand the welfare, safeguarding and child protection issues affecting these children and consider the impact that these experiences may have on their attendance, engagement, behaviour, progress and achievement.

This will include:

- Maintaining an up-to-date overview of children who have, or have had, a social worker, including their attendance, progress and attainment;
- Promoting a culture of high expectations and aspirations for these children;
- Supporting teaching and pastoral staff to provide appropriate academic support, pastoral intervention and reasonable adjustments;
- Recognising that the impact of abuse, neglect or other adverse experiences may continue after statutory social care involvement has ended; and
- Working with children's social care, the virtual school head and other relevant professionals, where appropriate, to improve attendance, engagement and educational outcomes.

16.EXTRA-FAMILIAL HARMS (AKA. CONTEXTUAL SAFEGUARDING)

Extra-familial harm refers to abuse or exploitation that occurs outside a child's family environment. Contextual safeguarding is the approach used to understand and respond to the wider relationships, environments and circumstances in which such harm may occur.

Leaders will assess the risks and issues within the school and the wider community when considering the safety and wellbeing of pupils. These risks may include:

- Child sexual exploitation and sexual harassment;
- Abuse within children's intimate relationships, including physical, sexual or emotional abuse and stalking;
- Child criminal exploitation, including county lines and financial exploitation;
- Serious youth violence, gang involvement and threats involving weapons;
- Radicalisation; and
- Online abuse, exploitation and harmful digital content.

The school will also identify and respond to risks that are specific to its local context, including particular locations, peer groups, times of day, transport routes and online environments. These risks will inform

safeguarding practice, staff training, the curriculum and partnership work with parents, the police, children's social care and other relevant agencies.

17.POLICE AND CRIMINAL EVIDENCE ACT (1984) – CODE C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding Lead (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the Designated Safeguarding Lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned[3] before being questioned about an offence[4], or asked further questions if the answers they give provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A police officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

THE APPROPRIATE ADULT MEANS, IN THE CASE OF A CHILD:

1. The parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. A social worker of a local authority
3. Failing these, some other responsible adult aged 18 or over who is not:
    - A police officer;
    - Employed by the police;
    - Under the direction or control of the chief officer of a police force; or
    - A person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

[3] The police caution is: "You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."

[4] A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

18.FILTERING AND MONITORING

Filtering and monitoring systems are essential to safeguarding children at Romero Catholic Academy Trust. We will take all reasonable steps to minimise pupils' exposure to harmful and inappropriate content through the individual school's IT systems and internet-connected devices.

Clear roles and responsibilities are assigned for the management and oversight of filtering and monitoring. The responsible member of the Senior Leadership Team is supported by the DSL and the school's IT staff or provider.[5]

- The effectiveness of the school's filtering and monitoring arrangements will be reviewed at least once every academic year. Checks will cover all relevant internet-connected devices and locations, and a record of the review, findings and any actions taken will be retained.
  The school will ensure that its systems block access to harmful and inappropriate content, including content associated with abuse, exploitation, violence, extremism, pornography, self-harm and AI-generated sexual imagery, while avoiding unreasonable restrictions on teaching and learning.
- Monitoring arrangements will reflect the school's safeguarding risks and enable concerns to be identified and acted upon promptly. Staff will understand their responsibilities for reporting concerns, and any safeguarding information identified through monitoring will be referred to the DSL and managed in accordance with this policy.
- Breeches of the filtering and monitoring system will be recorded on CPOMS and reported to the governing body. Breeches for Romero Catholic Academy Trust will be recorded centrally and monitored by the Head of Safeguarding.

19.CHILD PROTECTION PROCEDURES

CHILDREN AND YOUNG PEOPLE WHO MAY BE PARTICULARLY VULNERABLE

Some children may be at greater risk of abuse, neglect or exploitation, or may face additional barriers to recognising or reporting harm. Factors may include prejudice and discrimination, isolation, dependency on adults, communication difficulties and assumptions that indicators of abuse relate to a child's disability or additional needs.

To ensure that all pupils receive appropriate protection and support, we will give particular consideration to children who:

- Are disabled, have special educational needs or certain medical conditions;
- Are young carers;
- Are pregnant or are parents themselves;
- Are affected by parental substance misuse, domestic abuse, parental mental health needs or parental offending;
- Are asylum seekers or refugees;
- Are living away from home, in temporary accommodation or experiencing homelessness;
- Live transient lifestyles or in chaotic and unsupportive home circumstances;
- Are looked after, previously looked after or have a social worker;
- Are vulnerable to bullying, prejudice, discrimination or social isolation;
- Have communication needs or do not have english as their first language;

[5] Details of systems and professionals with responsibility can be found in Appendix C

- Are dependent on adults for personal or intimate care;
- May have difficulty recognising that behaviour towards them is abusive;
- Have experienced repeated removal from the classroom, multiple suspensions or a part-time timetable, or are at risk of permanent exclusion;
- Display early signs of abusive, violent or harmful behaviour;
- Are at risk of child sexual exploitation, child criminal exploitation, trafficking or modern slavery;
- Are at risk of female genital mutilation, forced marriage, or other honour or faith-based abuse;
- Are involved in the court system or have a family member in prison;
- Are at risk of serious violence, gang involvement or county lines; or
- Are at risk of being radicalised into terrorism.

This list provides examples and is not exhaustive. The school will consider each child's individual circumstances and ensure that safeguarding information and support are provided in accessible formats and, where appropriate, community languages.

20.CHILDREN WHO ARE QUESTIONING THEIR GENDER AND REQUESTS FOR SUPPORT WITH SOCIAL TRANSITION

Romero Catholic Academy Trust schools will provide a respectful and supportive environment for children who are questioning their gender. Bullying, harassment and discrimination will not be tolerated, and any related safeguarding or wellbeing concerns will be addressed promptly.

The school will not initiate social transition. Individual members of staff must not independently make changes relating to social transition, including changes to names, pronouns, uniform, facilities, sport or other arrangements.

Where a child or their parent or carer requests support involving social transition, the matter will be referred to the Headteacher and the DSL. The request will be considered through a careful, documented and case-by-case process.

Parents or carers will be involved as a matter of priority and their views will be given proper consideration. In the rare circumstances where there is reason to believe that involving parents or carers may place the child at increased risk, the DSL will determine what safeguarding action is necessary before parents are contacted or any decision is made.

Decisions will take account of:

- The welfare and best interests of the child and other children;
- The child's age, development, wishes and individual circumstances;
- Any wider mental health, medical, neurodevelopmental or safeguarding needs;
- Relevant clinical or other professional advice;
- The impact of agreeing or declining the request;
- The school's safeguarding responsibilities; and
- Its duties under the equality act 2010 and human rights act 1998.

Primary-age requests will be approached with particular caution. Staff will not provide clinical advice or undertake functions that require clinical expertise.

The school will explain that support with social transition will not include access to toilets, changing rooms, showers or residential accommodation designated for the opposite biological sex, or

participation in sport designated for the opposite sex where single-sex participation is necessary for safety.

The child's biological sex will be recorded accurately. Information will only be shared with staff who need it to safeguard and support the child and other pupils. Decisions and their rationale will be recorded and reviewed where circumstances change, including where a child wishes to reverse or amend an earlier arrangement.[6]

21.RECOGNISING ABUSE, NEGLECT AND EXPLOITATION

To ensure that pupils are protected from harm, staff must understand the behaviours and indicators associated with abuse, neglect and exploitation.

Abuse and neglect are forms of maltreatment. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may occur within or outside the home, within an institution or community, and online.

Abuse, neglect and exploitation are rarely isolated issues and may overlap. Children may be harmed by adults or by other children. Children may also cause harm to parents, carers or other family members, sometimes referred to as child-to-parent or caregiver abuse.

Keeping Children Safe in Education 2026 identifies four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. These are set out in Appendix E, together with relevant indicators of harm.

22. SPECIFIC SAFEGUARDING AND CHILD PROTECTION ISSUES

CHILDREN WHO DISPLAY HARMFUL SEXUAL BEHAVIOUR

Children who display harmful sexual behaviour may themselves have experienced abuse, neglect, trauma or exploitation. Safeguarding procedures will therefore consider the needs and welfare of both the child who has experienced harm and the child displaying the behaviour.

Harmful sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. The child's age, developmental stage, understanding, vulnerability, any difference in age or power and the context of the behaviour will be considered.

Staff who are concerned about a pupil's sexual behaviour, including behaviour occurring online, must speak to the DSL without delay.

All incidents involving the making or sharing of nudes and semi-nudes require a safeguarding response, whether apparently consensual or non-consensual. This includes photographs, videos, livestreams, digitally altered images and content generated using artificial intelligence, including deepfakes or "deep nudes". The school will follow current UKCIS guidance when responding to such incidents.

Part Five of Keeping Children Safe in Education 2026 provides detailed guidance on harmful sexual behaviour, sexual harassment and sexual violence.

[6] Flowchart document in Appendix D

CHILDREN ABSENT FROM EDUCATION

Knowing where children are during school hours is an important aspect of safeguarding. Repeated or prolonged absence from education may be an indicator of abuse, neglect or exploitation, including child criminal exploitation, child sexual exploitation, trafficking, modern slavery, serious violence, forced marriage or female genital mutilation.

Romero Catholic Academy Trust schools will monitor attendance carefully and respond promptly to unexplained, repeated or prolonged absence. Particular consideration will also be given to children who:

- Are repeatedly absent during parts of the school day;
- Have experienced repeated classroom removal or multiple suspensions;
- Are placed on a part-time timetable;
- Are at risk of permanent exclusion; or
- Fail to take up an allocated school place.

The school will:

- Ensure that staff understand their responsibilities for responding to absence from education;
- Maintain clear procedures for following up unexplained absence and escalating safeguarding concerns;
- Make reasonable enquiries to establish a child's whereabouts and safety;
- Work with parents, the local authority, children's social care, the police and other agencies where appropriate;
- Notify the local authority where required under the relevant attendance and admission-register regulations; and
- Follow Romero Catholic Academy Trust's attendance and children-missing-education procedures when a pupil's whereabouts cannot be established.

When a pupil leaves a Romero Catholic Academy Trust school, we will take reasonable steps to identify their destination, record the name of the receiving school and expected start date, and transfer safeguarding information securely in accordance with this policy.

Staff must remain alert to patterns of absence or changes in attendance that may indicate a wider safeguarding concern. Where the relevant threshold is met, concerns will be referred to children's social care or the police.

Parents and carers are expected to provide the school with at least two current emergency contact numbers and to notify the school promptly of any changes.

CHILD-ON-CHILD SEXUAL HARASSMENT, SEXUAL VIOLENCE AND ABUSE

At Romero Catholic Academy Trust we believe that every child has the right to attend and learn in a safe environment. Child-on-child abuse, sexual harassment and sexual violence are never acceptable and will not be tolerated.

Although girls are more likely to experience sexual harassment and sexual violence, any child can be a victim, and abuse may occur between children of any age or sex. All children who report abuse will be taken seriously, supported and kept safe, regardless of how long it has taken them to come forward.

We recognise that child-on-child abuse may be occurring even where no reports have been made. Children may not feel ready or able to describe their experiences, may not recognise the behaviour as

harmful, or may communicate their concerns indirectly through their behaviour, presentation or relationships. Reports may also be made by friends, parents or other adults, or arise from something witnessed or overheard by a member of staff.

Staff must act immediately where they have concerns about a child's welfare and must not wait for a direct disclosure.

Child-on-child abuse may include, but is not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- Abuse within intimate personal relationships between children;
- Physical abuse, including serious physical assault and threats involving weapons;
- Sexual harassment and sexual violence;
- Harmful sexual behaviour;
- Misogynistic or misandrist abuse and harassment;
- Causing another child to engage in sexual activity without consent;
- Making or sharing nudes and semi-nudes, including digitally altered or ai-generated images, deepfakes and "deep nudes";
- Upskirting; and
- Initiation or hazing-type violence and rituals.

Sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. The school will consider the child's age, developmental stage, understanding, vulnerability, the nature and frequency of the behaviour, any difference in age or power and the wider context.

Staff must never dismiss abusive or harmful behaviour as "banter", "just having a laugh", "part of growing up" or "boys being boys". Doing so can create an unsafe culture, normalise abuse and discourage children from reporting concerns.

Child-on-child abuse is preventable. Romero Catholic Academy Trust schools will seek to identify concerns early and provide timely, appropriate and evidence-based support to reduce the risk of behaviour escalating.

WHOLE SCHOOL APPROACH

The school will maintain a whole-school approach to preventing and responding to child-on-child abuse by:

- Providing an age-appropriate preventative curriculum covering healthy relationships, consent, respectful behaviour, online safety and how to seek help;
- Ensuring that staff receive appropriate training to recognise, report and respond to concerns;
- Providing children with clear, accessible and trusted routes for reporting concerns;
- Challenging inappropriate, abusive, misogynistic and misandrist behaviour;
- Completing prompt and proportionate risk assessments and safety and support plans;
- Monitoring patterns, trends, locations and times where concerns are more likely to arise;
- Sharing relevant safeguarding information and emerging local trends with safeguarding partners, where appropriate; and
- Using incidents and pupil voice to review the curriculum, behaviour systems, staff training and the school's physical and online environments.

Responding to concerns and reports

All concerns and reports must be shared with the DSL without delay and recorded in accordance with Romero Catholic Academy Trust's safeguarding procedures.

The DSL will determine what immediate action is required and whether advice should first be sought from children's social care or the police. Staff should use only limited and open questions necessary to clarify what has been reported. They must not undertake an investigation or routinely seek written statements from the children involved where this may interfere with a statutory investigation.

The school will give immediate safeguarding consideration to:

- The child who may have experienced harm;
- The child alleged to have displayed the harmful behaviour;
- Any other children directly involved; and
- Any risk to the wider pupil body.

A proportionate risk assessment and safety and support plan will be developed where appropriate. This may include changes to supervision, timetables, movement around the site, seating, transport or other arrangements required to keep children safe.

Parents and carers will normally be informed and involved unless doing so may place a child or another person at increased risk, compromise an investigation or otherwise be contrary to the child's welfare.

Appropriate support will be provided to the child who has experienced harm and to the child alleged to have displayed the harmful behaviour. Children who display harmful behaviour may themselves have experienced abuse, neglect, exploitation or trauma and may require safeguarding intervention.

Mediation, restorative work or direct contact between the children will not be used where it may place pressure on, blame or retraumatise a child. Any such work will only be considered following a careful assessment of risk, suitability and the wishes and welfare of the child who has experienced harm.

Safety and support arrangements will be reviewed for as long as safeguarding risks or support needs remain. The decision to close a safeguarding concern will be made professionally by the DSL, based on the available evidence, the level of risk and the effectiveness of the support in place. Closure will not depend on both children agreeing that the matter has been resolved.

TEMPORARY SEPARATION OF PUPILS FOR SAFEGUARDING PURPOSES

In rare circumstances, it may be necessary to temporarily prevent a pupil from attending the school's premises in order to separate them from another pupil for safeguarding purposes. This may include circumstances where an allegation of serious harm has been made by one pupil against another.

This is not a suspension or permanent exclusion on disciplinary grounds and will not be used as an informal or precautionary exclusion. A decision will only be made where:

- There is an identified safeguarding risk;
- Separating the pupils is essential to protect one or more children; and
- The separation cannot practicably be achieved through arrangements that allow the pupils to remain on the school premises.

The decision will be made on a case-by-case basis. The DSL or a Deputy DSL will take a lead role and will complete or update an appropriate risk and needs assessment. Advice will be sought from children's social care, the police, the Local Authority, the Trust or other relevant agencies where required.

The school will consider:

- The best interests, safety and welfare of all children involved;
- The wishes and feelings of the children, where appropriate;
- Its duties under the equality act 2010 and human rights act 1998;
- Whether reasonable adjustments or alternative on-site arrangements could safely manage the risk;
- The educational and support needs of the pupil who will not attend the premises; and
- How long the arrangement is necessary and how frequently it will be reviewed.

Parents or carers will be informed of the reason for the temporary separation. The Local Governing Body and Trust Board of Directors will also be notified without delay.

The arrangement will be kept under regular review and will remain in place only for as long as it is necessary and proportionate. Appropriate education, pastoral support and contact will be maintained throughout the period, and a clear reintegration and safety plan will be established before the pupil returns.

The guidance also states that, where the school or parent does not arrange education during this period, the local authority must arrange it under section 19 of the Education Act 1996. Reintegration arrangements should be planned and regularly reviewed with the pupil, parents and relevant professionals.

CHILD ON CHILD ABUSE

Romero Catholic Academy Trust recognises that children can abuse other children and that this can occur inside or outside school within intimate relationships and online. Child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child alleged to have caused harm.

All staff will be aware that child-on-child abuse may be occurring even where no reports have been made. Staff must report concerns through the schools normal safeguarding procedures and must not dismiss harmful behaviour as "banter", "part of growing up" or "boys being boys".

Child-on-child abuse may include, but is not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- Abuse within intimate personal relationships between children;
- Physical abuse, including hitting, kicking, shaking, biting, hair pulling, serious physical assault and threats involving weapons;
- Sexual violence, including rape, assault by penetration and sexual assault;
- Sexual harassment, including sexual comments, remarks, jokes and online
- Sexual harassment;
- Misogynistic or misandrist abuse and harassment;
- Causing another person to engage in sexual activity without consent;
- Making or sharing nudes and semi-nudes, including digitally altered or ai-generated images, deepfakes and "deep nudes";
- Upskirting; and

- Initiation or hazing-type violence and rituals.

Child-on-child abuse is preventable. The school will seek to identify concerning behaviour at an early stage and provide timely and appropriate support to reduce the risk of harm or escalation.

Where Romero Catholic Academy Trust or the school receives a report of child-on-child abuse, it will follow the principles set out in Part Five of Keeping Children Safe in Education 2026 and the procedures contained within this policy.

All concerns will be shared with the DSL without delay. The DSL will:

- Consider the immediate safety and welfare of the child who may have experienced harm, the child alleged to have caused harm, any other children involved and the wider pupil body;
- Decide what limited and open questions are necessary to clarify the concern, taking care not to undertake an investigation or compromise any police or social care enquiries;
- Seek advice from children's social care, the police or other relevant agencies where appropriate;
- Complete or update a proportionate risk assessment and safety and support plan;
- Consider the wishes and feelings of the children involved;
- Ensure that appropriate support is provided to both the child who has experienced harm and the child alleged to have caused harm; and
- Record the concern, decisions, actions and outcomes on CPOMs.

Parents and carers will normally be informed and involved unless doing so may increase the risk to a child or another person, compromise an investigation or otherwise be contrary to the child's welfare.

The school will not routinely seek written statements from both children. Any initial discussion will be limited to establishing the basic facts and determining what immediate safeguarding action is required.

Mediation, restorative work or direct contact between the children will not be used where this could place pressure on, blame or retraumatise a child. Any such intervention will only be considered following an assessment of risk, suitability and the wishes and welfare of the child who has experienced harm.

Where appropriate, consequences may be considered in accordance with the school's Behaviour Policy. Safeguarding support will not be withdrawn solely because disciplinary action is taken.

Where a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who made the report, or any other child involved, requires support or may have experienced harm from another source. A referral to children's social care or another agency will be considered where appropriate.

Where there is clear evidence that a report was deliberately invented or malicious, the school may consider proportionate action under the Behaviour Policy. The fact that a report is not substantiated does not, by itself, mean that it was deliberately false or malicious.

Safety and support arrangements will be reviewed for as long as risks or support needs remain. The decision to close the safeguarding concern will be made by the DSL based on the available evidence, level of risk and effectiveness of the support in place. Closure will not depend on both children agreeing that the matter has been resolved.

CHILDREN AND THE COURT SYSTEM

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them, or for crimes they have witnessed. The families of children may also be subject to child arrangements processes through the family court system.

We recognise that both circumstances may be stressful for children and appropriate support will be provided in line with local and national guidance.

CHILD SEXUAL EXPLOITATION

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This may be in exchange for something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence.

Children may be drawn into exploitation through apparent friendship or affection, gifts, money, drugs, alcohol, accommodation or the promise of status or belonging. Exploitation may occur over time or as a one-off incident and may take place without the child's immediate knowledge, including through the creation or sharing of images online.

Children cannot consent to their own exploitation. A child may not recognise that they are being exploited, may believe they are in a genuine relationship, or may be criminalised for actions undertaken under coercion.

Exploitation may be committed or facilitated by an individual, organised network or gang. It may also involve trafficking or constitute modern slavery and may require consideration of a referral through the National Referral Mechanism.

We include the risks of child sexual exploitation within the PSHE and RSE curriculum.

All staff are made aware of the indicators of child sexual exploitation and must report any concerns immediately to the DSL.

HONOUR AND FAITH-BASED ABUSE

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. Staff will receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

FEMALE GENITAL MUTILATION (FGM)

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so School staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a female pupil about going on a long holiday during the summer vacation period.

Teachers have a mandatory duty to personally report to the police cases where they discover that an act of FGM appears to have been carried out. This should be done with the support of the DSL so that wider concerns for the child or young person are also considered. This will also enable leaders to support the staff member through this process.

RADICALISATION AND EXTREMISM

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

Safeguarding information connected with a Channel or Prevent concern will be shared with the police, Romero Catholic Academy Trust Head of Safeguarding and other appropriate partners.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or deputy) making a Prevent referral.

Romero Catholic Academy Trust is committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups

- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

All Romero Catholic Academy Trust staff receive training to help to identify signs of extremism.

Opportunities are provided through the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and leaders follow the DfE advice *Promoting fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools* (2014).

PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the School should notify the Local Authority of the circumstances.

LOOKED AFTER (AND PREVIOUSLY LOOKED AFTER) CHILDREN

The most common reason for children becoming looked after is as a result of abuse or neglect. Leaders ensure that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about individual children's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

Romero Catholic Academy Trust school's designated teachers will work with the Virtual School Head's in supporting attendance and support their non-statutory role relating to children in kinship-care arrangements.

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

WORK EXPERIENCE

We have detailed procedures to safeguard pupils undertaking work experience and will ensure that placement providers have appropriate policies and procedures in place to protect children from harm.

Where an adult provides teaching, training, instruction, care or supervision to a pupil frequently, for more than three days in any 30-day period, or overnight, this will be treated as regulated activity, even where the adult is supervised. The placement provider must ensure that no person who is barred from working with children undertakes such activity.

All checks and safeguarding arrangements will be considered in accordance with Part Three of Keeping Children Safe in Education 2026, including the specific checking restrictions that apply where pupils aged 16 or 17 undertake work experience.

CHILDREN STAYING WITH HOST FAMILIES

Leaders may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during term time and we will work with the Local Authority to check that such arrangements are safe and suitable. In such circumstances, we follow the guidance set out in Keeping Children Safe in Education (2026) to ensure that hosting arrangements are as safe as possible.

CHILDREN WITH FAMILY MEMBERS IN PRISON

Children who have family members that are sent to prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We recognise that these children may need support. Support will be provided in line with guidance from the National Information Centre on Children of Offenders and local agencies

CRIMINAL EXPLOITATION OF CHILDREN AND COUNTY LINES

Child criminal exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence.

CCE may be committed or facilitated by an individual, organised criminal network or gang. Children may be forced or manipulated into transporting drugs or money, working in cannabis factories, shoplifting, pickpocketing, committing vehicle crime or threatening or committing serious violence.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile telephone lines or another form of “deal line”. This activity may take place locally or across the UK. Children and vulnerable adults may be exploited to move, store or sell drugs and money.

Gangs may establish a base within the home of a vulnerable person through force or coercion. This is commonly referred to as “cuckooing”. Children may also be recruited and exploited online through social media and other digital platforms.

Children may become trapped through threats of violence, intimidation, manufactured drug debts or threats against their families. They may be coerced into carrying weapons or may begin carrying a weapon because they believe it will protect them from harm.

A child cannot consent to being exploited, abused or trafficked. Criminal exploitation may have occurred even where the activity appears voluntary or the child identifies as belonging to the group involved. Children who are criminally exploited must be recognised and treated as victims, including where they have committed offences as a result of coercion.

CCE may involve trafficking and constitute modern slavery. Where a potential victim is identified, the School will follow its child protection procedures and consider a referral through the National Referral Mechanism, alongside any referral to children’s social care or the police.

Staff will remain alert to indicators of CCE and county lines and must report any concerns immediately to the DSL.

SERIOUS VIOLENCE

Serious violence is a safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict, bullying, gang involvement or criminal exploitation.

Staff will remain alert to indicators that a child may be at risk of, or involved in, serious violence.

These may include:

- Increased or unexplained absence from education;
- Changes in friendships or relationships with older individuals or groups;
- A significant decline in educational performance;
- Signs of assault, unexplained injuries or self-harm;
- Significant changes in behaviour or wellbeing;
- Unexplained gifts, money or new possessions;
- Involvement in peer conflict, gangs or criminal networks; or
- Carrying a weapon, threatening to use a weapon or expressing an intention to do so.

The risk of serious violence may be increased for children who have experienced disrupted education, including repeated suspensions, permanent exclusion or time in alternative provision, or who have a history of offending. Staff will also remain alert to periods when children may be at increased risk, including immediately before or after the school day.

Any concern that a child is carrying, using or threatening to use a weapon, or intends to do so, must be reported immediately to the DSL or a Deputy DSL.

The DSL will assess the risk to the child and others, taking account of all available safeguarding and contextual information.

Depending on the level of risk, the school will:

- Put in place an appropriate safety and support plan;
- Take action to de-escalate peer conflict;
- Consider the safety of other pupils and staff;
- Share relevant information with children's social care, the police and other agencies; and
- Provide or seek early, evidence-based support, including access to trusted adults, mentoring, therapeutic support or other targeted interventions.

Where a child is in immediate danger, or a weapon is present, staff will contact the police without delay.

DOMESTIC ABUSE

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result

Domestic abuse affecting young people can also occur within their relationships, as well as in the context of their home life.

All Romero Catholic Academy Trust schools are part of Operation encompass. Operation Encompass is a partnership between police and education settings that supports children and young people who may have been affected by domestic abuse. When police attend an incident of domestic abuse where a child is present, experienced, or otherwise connected to the incident, a notification is shared with the child's school or educational setting before the start of the next school day. This enables designated safeguarding staff to provide timely and appropriate support to the child.

The aims of Operation Encompass are to:

- Recognise the impact domestic abuse can have on children and young people.
- Improve communication between police and education settings.
- Ensure children receive appropriate emotional and practical support following a domestic abuse incident.
- Promote early intervention and safeguarding to reduce the risk of further harm.

The Designated Safeguarding Lead (DSL) is responsible for receiving and acting upon Operation Encompass notifications, ensuring information is handled confidentially and that support is provided in line with the setting's safeguarding procedures.

This information sharing is undertaken in accordance with safeguarding legislation, data protection requirements, and local safeguarding partnership arrangements

HOMELESSNESS

Being homeless, at risk of homelessness or living in temporary accommodation can present a significant risk to a child's welfare, attendance, wellbeing and educational outcomes.

In most cases, staff will consider homelessness in the context of children living with their families. However, some 16- and 17-year-olds may be living independently, including following exclusion from the family home, and may require a different level of assessment and support.

The DSL will support and signpost pupils and families to appropriate housing, welfare and local support services. Where homelessness or temporary accommodation gives rise to concerns that a child may be suffering, or is likely to suffer, harm, the school will make a referral to children's social care.

The school will respond appropriately to any temporary-accommodation notifications received from the local authority and will consider the impact on the child's safeguarding, attendance and support needs.

CHILDREN WITH A SOCIAL WORKER

At Romero Catholic Academy Trust, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

The knowledge that a child has, or has previously had a social worker, will routinely inform decisions about attendance, pastoral provision, academic support and responses to absence.

Where appropriate the school will liaison with the Virtual School Head.

YOUNG CARERS

Young carers may experience additional pressures as a result of providing care or support to a family member. These responsibilities may affect their attendance, punctuality, attainment, behaviour, emotional wellbeing and ability to participate fully in school life.

Romero Catholic Academy Trust schools will seek to identify young carers at an early stage and will ensure that staff remain alert to indicators that a child may have caring responsibilities.

Where a young carer is identified, the school will:

- Consider appropriate pastoral support and reasonable adjustments;
- Work with the child and their family to understand their needs;
- Monitor the impact of caring responsibilities on attendance, progress and wellbeing; and
- Make referrals to relevant local young carer services or other agencies where additional support is required.

CHILDREN AND ONLINE HARM

When children use the school's network to access the internet, they are protected through appropriate filtering and monitoring systems. However, pupils may also access online content through personal devices, mobile data and applications that are not controlled by the school.

Online and offline safeguarding risks are often connected. These may include harmful content or contact, child-on-child abuse, exploitation, cybercrime, misogynistic or harmful online influences, generative artificial intelligence, deepfakes and the creation or sharing of AI-generated sexual imagery.

Where pupils use school devices or systems, appropriate supervision will be provided and the effectiveness of filtering and monitoring arrangements will be reviewed regularly.

All staff who interact with children, including online, must remain alert to signs that a child may be at risk. Concerns must be reported to the DSL and managed in accordance with this policy, including referral to children's social care or the police where appropriate.

ONLINE SAFETY AWAY FROM THE SCHOOL

Online teaching and communication with pupils will follow the same safeguarding principles and professional standards that apply to face-to-face contact. Staff must comply with Romero Catholic Academy Trust's Staff Code of Conduct, Online Safety Policy and any approved remote-learning procedures.

Romero Catholic Academy Trust schools will ensure that online learning tools and systems are approved, secure and used in accordance with data protection and privacy requirements.

Staff will:

- Use only platforms and accounts approved by the school;
- Maintain appropriate professional boundaries and language;
- Ensure that online sessions are conducted in a suitable and professional manner;
- Follow school procedures for one-to-one communication and online lessons;
- Record relevant details of sessions where required; and
- Report any safeguarding concern arising during online contact without delay.

Detailed arrangements for remote teaching, the use of webcams, recording sessions and one-to-one contact are set out in the school's Online Safety, Remote Learning and Romero Academy Trust's Staff Code of Conduct policies.

All staff who interact with children online must continue to look out for signs that a child may be at risk. Any concern will be managed in accordance with this child protection policy and referred to children's social care or the police where appropriate.

MOBILE PHONES AND GENERATIVE ARTIFICIAL INTELLIGENCE

Romero Catholic Academy Trust will operate as a mobile phone-free environment by default. Pupils will not have access to mobile phones during lessons, movement between lessons, breaktimes or lunchtimes. Any exception must be authorised and documented in accordance with the school's Mobile Phone Policy, for example where access is required because of a medical need, disability or other exceptional circumstance.

Safeguarding concerns involving mobile phones, personal devices, mobile data, messaging applications, image sharing, online harassment or access to harmful content will be reported to the DSL and managed under this policy.

Only generative artificial intelligence systems approved by Romero Catholic Academy Trust may be used for school purposes. Their use will be subject to appropriate safeguarding, data-protection, confidentiality, ethical and intellectual-property controls.

Staff and pupils must not enter confidential or identifiable information about a child into a generative AI system unless its use has been expressly authorised and is satisfied that appropriate data-protection safeguards are in place.

Harmful interactions with generative AI applications, AI-generated explicit imagery, deepfakes, manipulation, bullying or any other AI-related safeguarding concern must be reported to the DSL without delay.

CHILDREN WITH MEDICAL CONDITIONS

A concern relating to the management of a child's medical condition will not automatically be treated as a safeguarding concern. However, staff must report the matter to the Designated Safeguarding Lead where the circumstances may indicate abuse, neglect or exploitation.

This may include, for example, where a child is repeatedly sent to school without essential medication or medical equipment, where necessary treatment or appointments are persistently withheld, or where there are concerns that symptoms are being fabricated or deliberately induced.

The DSL will consider the child's individual circumstances, seek appropriate advice and determine whether support, a referral to children's social care or other safeguarding action is required

CHILDREN'S MENTAL HEALTH

All staff will be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Mental health difficulties may also develop into a safeguarding concern, including where a child is experiencing self-harm, an eating disorder, suicidal ideation or a risk of suicide.

Only appropriately trained professionals should diagnose mental health conditions. However, staff are well placed to observe children day to day and identify changes in behaviour, presentation or emotional wellbeing that may indicate a child requires additional support.

Possible indicators may include:

- Significant changes in behaviour, mood or educational engagement;
- Becoming withdrawn, fearful, aggressive or unusually distressed;
- Changes in friendships, sleep, eating or personal care;
- A loss of interest in activities previously enjoyed;
- Signs of self-harm, self-neglect or disordered eating; or
- Statements or behaviour indicating suicidal thoughts or intent.

Children who have experienced abuse, neglect, exploitation or other traumatic experiences may experience a lasting impact on their mental health, behaviour, attendance, relationships and educational outcomes.

Where a member of staff has a mental health concern about a child that is also a safeguarding concern, they must take immediate action by recording the concern on CPOMS and speaking to the DSL or a Deputy DSL.

Where a child is in immediate danger or there is an immediate risk of serious harm, staff will contact the emergency services by calling 999 or arrange urgent attendance at an emergency department. Urgent mental health support that is not an emergency may be sought through NHS 111 and the mental health option, alongside local crisis services.

Romero Catholic Academy Trust schools will work with the child, their parents or carers where appropriate, the Senior Mental Health Lead, Mental Health Support Team and other relevant professionals and agencies. Support and interventions provided by the school will be safe, evidence-based, appropriate to the child's age, developmental stage and level of need, and kept under regular review.

Staff will have regard to relevant government guidance, including Mental Health and Behaviour in Schools, and will work with local partners to identify children who may benefit from additional support and ensure that appropriate help is put in place.

23. TAKING ACTION

Any child, in any family in any school, could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

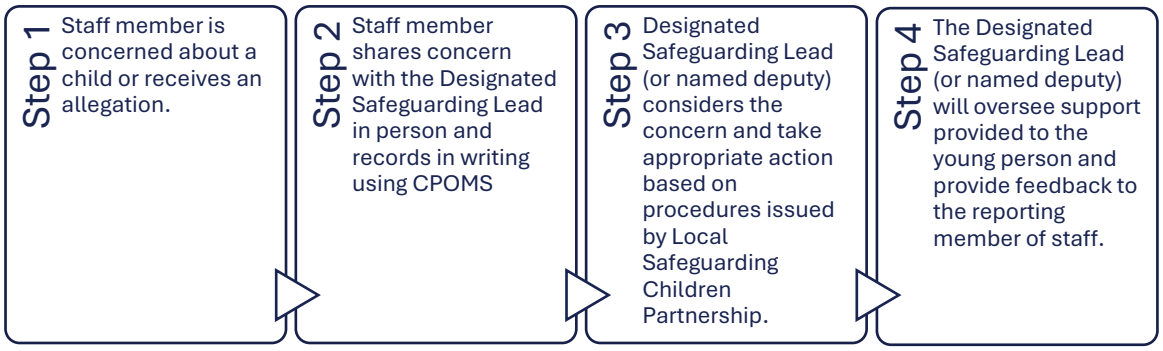
Key points for staff to remember for taking action are:

- In an emergency take the action necessary to help the child, if necessary, call 999;
- Report your concern as soon as possible to the DSL, definitely by the end of the day;
- Do not start your investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- Complete a record of concern in writing (to the DSL) via CPOMS after speaking to the DSL in person where the concern is significant.
- Seek support for yourself if you are distressed.

Any verbal conversations around safeguarding should be recorded in writing and shared with the DSL.

Staff should be familiar with *'What to do if you're worried a child is being abused'* as it contains excellent examples of the different types of safeguarding issues.

This step-by-step process should be used as a quick reference guide.



If the DSL is not available, staff should speak to a member of the Senior Leadership Team and/or take advice from local children's social care [7](KCSIE, 2026).

Staff can always seek advice and guidance from Romero Catholic Academy Trust's Head of Safeguarding, if they are unable to contact the Designated Safeguarding Lead, a Deputy, or a member of the Senior Leadership Team.

IF YOU ARE CONCERNED ABOUT A PUPIL'S WELFARE

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use CPOMS to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should alert the DSL to their concern.

CPOMS is the single point for the delivery of concerns. Once staff record a concern on CPOMS, it will automatically alert the Designated Safeguarding Lead that a concern form has been raised.

IF A PUPIL DISCLOSES TO YOU

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that to help them they must pass the information on to the DSL. The point at which they tell the pupil this is a matter for professional judgement. During their conversations with the pupils', staff will:

[7] Contact details available in Appendix A.

- Allow them to speak freely;
- Remain calm and not over-react;
- Give reassuring nods or words of comfort – 'i'm so sorry this has happened', 'i want to help', 'this isn't your fault', 'you are doing the right thing in talking to me';
- Not be afraid of silences;
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it;
- At an appropriate time tell the pupil that to help them, the member of staff must pass the information on and explain to whom and why
- Not automatically offer any physical touch as comfort;
- Avoid admonishing the child for not disclosing earlier. Saying things such as 'i do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong;
- Tell the pupil what will happen next;
- Report verbally to the DSL even if the child has promised to do it by themselves;
- Complete the record of concern form on CPOMS and submit it for the attention of the DSL as soon as possible;
- Seek support if the staff member feels distressed.

NOTIFYING PARENTS

Staff will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Whilst parents will normally be involved in support planning where safe and appropriate, advice will be sought from external partners before contact where this may increase risk, compromise an enquiry or place another person at risk.

REFERRAL TO CHILDREN'S SOCIAL CARE

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made unless to do so would increase the risk to the child.

In the above circumstance, contact should be made with the MASH and/or the police (in an emergency on 999 or on 101) Emergency Out of Hours Social Work Service. [8]

Professionals can consult with a children's Social Worker in the Local Authority if they are unsure whether a Social Work Assessment is necessary and this can be done directly to the Locality Children's Team but if a referral is to be made, this should be done through the MASH.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

[8] Specific details can be found in Appendix A

- The situation is an emergency and the designated safeguarding lead, their deputy, the Headteacher and the Trust Head of Safeguarding are all unavailable
- They are convinced that a direct report is the only way to ensure the pupil's safety
- For any other reason, they make a judgement that direct referral is in the best interests of the child.

ESCALATING CONCERNS

Staff need to be aware of those times when concerns may look as though they are not progressing to an outcome or some form of action. This may be indicated by:

- Difficulty in getting hold of a DSL;
- Staff not being satisfied with the decision of the DSL or headteacher
- Staff aware that a colleague has not passed on a concern;
- External agencies not accepting a referral from a school when it is felt one is needed;
- Staff not aware of what has happened to their concern because of a lack of feedback.

Staff must not close down a concern because they feel "stuck" or "they can't do any more". It is important to escalate concerns to DSLs, Headteacher, other senior staff or if necessary, to Romero Catholic Academy Trust's Head of Safeguarding or Chief Executive Officer.

If there are concerns about the work of an external agency staff the will follow the escalation steps outlined in the locally agreed procedures documents.

The important principle is not to allow a concern to be "closed down" without it having received the necessary attention, assessment and resolution.

ESCALATION TO ROMERO CATHOLIC ACADEMY TRUST

The Designated Safeguarding Lead must notify the Romero Catholic Acdemy Trust Head of Safeguarding within one working day, where:

- a child suffers serious harm;
- a child dies and abuse or neglect is known or suspected;
- a Child Safeguarding Practice Review may be required;
- a serious allegation is made against a member of staff;
- a serious safeguarding incident occurs;
- safeguarding concerns attract police interest;
- safeguarding concerns attract media attention;
- Ofsted identifies safeguarding weaknesses;
- safeguarding arrangements are considered ineffective; or
- a significant safeguarding risk arises that may require Trust support or intervention.

The Head of Safeguarding will determine what support, oversight, reporting or escalation is required.

24.CONFIDENTIALITY AND SHARING INFORMATION

All Romero Catholic Academy Trust staff understand that child protection information requires a high level of confidentiality. This protects the privacy of the child and others involved and helps to ensure that the inappropriate disclosure of information does not compromise safeguarding action or an investigation.

Staff should ordinarily share safeguarding concerns with the DSL or a Deputy DSL, who will determine what information needs to be shared and with whom. Information will be shared only with those who need it to safeguard and promote the welfare of the child.

However, any member of staff may contact children's social care, the police or another appropriate agency directly where they believe this is necessary to protect a child. Staff must not assume that a colleague or another professional has already shared information or taken action.

Child protection information will be stored, processed and shared in accordance with data protection laws, including:

- the Data Protection Act 2018;
- the UK General Data Protection Regulation; and
- the Data (Use and Access) Act 2025.

Information sharing will be:

- lawful, necessary and proportionate;
- relevant to the current safeguarding risk;
- limited to what the recipient genuinely needs to know;
- adequate and clearly presented within its proper context;
- accurate and up to date;
- shared in a timely manner; and
- transferred and stored securely.

Data protection laws do not prevent the sharing of information for the purpose of keeping children safe. Concerns about data protection or confidentiality must not be allowed to prevent appropriate safeguarding action.

Where appropriate and safe, the DSL will explain to the child and/or parents or carers what information will be shared and may seek their consent. Consent is not always required before sharing safeguarding information.

Information may be shared without consent where there is a lawful basis to do so, including where:

- it is not possible or reasonable to obtain consent;
- seeking consent may place a child or another person at increased risk;
- seeking consent may compromise an investigation; or
- sharing the information is necessary to safeguard or promote the welfare of a child.

All information-sharing decisions will be recorded, including:

- what information was shared or withheld;
- with whom it was shared;
- the reason for the decision;
- the lawful basis relied upon, where relevant; and
- the outcome or action agreed.

This includes recording the rationale where a referral to another agency was considered but not made.

Child protection records will be held securely within CPOMS and separately from the main pupil file. Access will be restricted to those who require the information to fulfil their safeguarding responsibilities.

Requests from pupils, parents or carers to access child protection records will be referred to the Headteacher and considered in accordance with Romero Catholic Academy Trust's data protection and information-governance policies. Information may be withheld where a relevant legal exemption applies, including where disclosure may cause serious harm to the child or another person.

Where a pupil transfers to another school or college, safeguarding records will be transferred securely and separately from the main pupil file. Relevant information may also be shared in advance where this is necessary to enable the receiving setting to assess risk and put appropriate safety and support arrangements in place.

INFORMATION SHARING AND GDPR

Effective safeguarding depends upon timely, lawful and proportionate information sharing.

The Trust recognises that data protection legislation does not prevent, or limit, the sharing of information where there is a safeguarding concern.

When considering requests for information from other agencies, staff should satisfy themselves that:

- There is a clear purpose for the request;
- The request is necessary and proportionate;
- There is a lawful basis for sharing the information;
- Only relevant information is shared;
- Information is shared securely; and
- The rationale for sharing, or not sharing, is recorded.

Where safeguarding concerns exist, staff should not allow uncertainty regarding data protection to prevent appropriate action being taken to protect a child.

25.UNIVERSAL AND COMMUNITY-BASED EARLY HELP AND FAMILY HELP

Providing help and support as soon as problems emerge is an important part of safeguarding children and promoting their welfare.

Universal services and community-based Early Help provide support at an early stage, before statutory intervention is required. Support may be delivered through education, health services, family hubs, youth services, housing services and voluntary or community organisations.

The DSL and Deputy DSL(s) will understand the local Early Help arrangements, threshold document and referral pathways and will ensure that staff know how to identify children and families who may benefit from additional support.

Where appropriate, Romero Catholic Academy Trust schools will work with the child, their parents or carers and relevant agencies to:

- Identify the child's needs and any emerging safeguarding concerns;
- Consider the child's wishes and feelings;
- Agree the support required and the outcomes to be achieved;
- Coordinate services through an identified lead practitioner where appropriate; and
- Regularly review whether the support is improving the child's circumstances.

Some children and families may require more targeted support than that available through universal or community-based Early Help. Family Help includes:

- Targeted early help coordinated by the local authority and its partners; and
- Statutory support and services for children in need under section 17 of the Children Act 1989.

Targeted early help is a voluntary arrangement and will ordinarily require the consent and participation of the child and their family. An appropriately qualified practitioner may lead the assessment and coordinate the Family Help plan. Where local arrangements permit, the same practitioner may continue to work with the family where the child is subsequently assessed as a child in need under section 17.

Where a child or family does not consent to targeted early help, or does not engage with the support offered, the DSL will consider whether the child's needs are likely to increase or whether there is a safeguarding risk that requires referral to local authority children's social care.

Family Help and Early Help cases will be kept under regular review. Where the child's circumstances do not improve, the support is not meeting their needs or concerns increase, the DSL will consider whether the matter should be escalated or referred for statutory assessment.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral will be made immediately to local authority children's social care under section 47 of the Children Act 1989 and, where appropriate, to the police.

The school will also understand and follow the local criteria and procedures relating to:

- Section 20 of the Children Act 1989, concerning the local authority's duty to accommodate a child;
- Section 31 of the Children Act 1989, concerning care and supervision orders;
- Disabled children;
- Children managed within the youth secure estate; and
- Children affected by abuse, neglect, exploitation, trafficking or modern slavery.

The school will support children's social care and other agencies with assessments and multi-agency plans. All concerns, discussions, decisions and the reasons for those decisions will be clearly recorded.

26.WHISTLEBLOWING

If the options above have been explored fully and the concern still isn't being handled effectively and is therefore placing the child or young person at risk, you must continue to escalate your concerns by contacting Romero Head of Safeguarding or by contacting the NSPCC Whistleblowing Advice Line on 0800 028 0285.

27.LEARNING FROM SAFEGUARDING REVIEWS

The Trust is committed to learning from local and national safeguarding reviews.

The Trust Safeguarding Lead will review:

- Child Safeguarding Practice Reviews;
- Rapid Reviews;
- Domestic Homicide Reviews;

- Safeguarding Adult Reviews where relevant;
- Local Safeguarding Partnership learning reviews; and
- Serious incidents occurring within academies.

Relevant learning will be shared with leaders, DSLs, staff, governors and where appropriate. Policies, procedures, training and safeguarding practice will be updated to reflect identified learning and emerging risks.

28.ROMERO CATHOLIC ACADEMY TRUST SAFEGUARDING STANDARDS

The following safeguarding standards apply to all schools within Romero Catholic Academy Trust.

Each school will:

- Maintain a trained Designated Safeguarding Lead and adequate Deputy DSL capacity;
- Ensure safeguarding representation within the senior leadership team;
- Maintain safeguarding records using the Trust-approved recording system;
- Maintain a compliant Single Central Record;
- Complete safeguarding training in accordance with Trust expectations;
- Participate in Trust safeguarding audits and reviews;
- Operate safer recruitment procedures;
- Maintain appropriate filtering and monitoring arrangements;
- Provide a safeguarding curriculum appropriate to pupils' age and understanding;
- Participate in Operation Encompass or equivalent arrangements where available;
- Report serious safeguarding incidents through Trust reporting processes; and
- Implement all Trust safeguarding policies and procedures.

Failure to meet these standards may result in additional support, monitoring or intervention from the Executive Team and Trust Board.

APPENDIX A - KEY STAFF AND CONTACTS

SCHOOL-BASED CONTACTS

Role	Contact details
Headteacher	Francesca Lord
Designated Safeguarding Lead	Hannah Laverty
Deputy Designated Safeguarding Lead	Laura Starkie
E-Safety Lead	Hannah Laverty
Prevent Duty Lead	Hannah Laverty
Designated Teacher with responsibility for Young Carers	Hannah Laverty
Designated Teacher for Looked After and Previously Looked After Children	Hannah Laverty
Nominated Safeguarding Governor	Rachael Wilson
All of the above can be contacted via the school office on 01706 213693	

OTHER USEFUL CONTACTS

Agency / Contact	Contact Details
INSERT MULTI-ACADEMY TRUST or LA Contacts	
Head of Safeguarding Romero Catholic Academy Trust	Rebecca.birtwistle@romerocat.com
Local contacts	
Children's Social Care - MASH Matt Chipchase, Adrienne Fox	PHONE 0300 123 6720 0300 123 6722 (out of hours) mash.education@lancashire.gov.uk
The Local Authority Designated Officer (LADO) Sean Penn	LADO.admin@lancashire.gov.uk 01772 536694
NSPCC Whistleblowing Advice Line	0800 028 0285

OPERATION ENCOMPASS

Operation Encompass is a national information-sharing scheme between the police and relevant education settings operating across England and Wales. The police have a statutory duty to notify a child's education setting (under the victim and Prisoners Act 2024), and where relevant the local authority, where they have reasonable grounds to believe that a child may be a victim of domestic abuse or other potential crimes.

This includes children connected to a household where police have attended a domestic abuse incident, children who were not physically present, and children who may reside in another household temporarily or permanently.

Children are recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

All Saints' is committed to Operation Encompass, and the timely sharing of information between police and schools following incidents of domestic abuse and other police-attended incidents that may have an impact on a child. The school will ensure that all stakeholders are informed of its participation in the initiative and its role in supporting children who may be victims of domestic abuse or affected by other significant incidents. The school will consider each notification appropriately in relation to the best way to support the child and family.

Advice may be sought from the police and/or Children's Social Care or the Operation Encompass Helpline following a report being received to ensure that the safety and welfare of the child is paramount. School are aware that any actions taken should be considered in terms of risk and care should be given to ensure that action does not increase risk to the pupil/victims.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The key adult for Operation Encompass is Miss Hannah Laverty/ Miss Laura Starkie

Advice on supporting children experiencing domestic abuse is available via the Operation Encompass Helpline: **0204 513 9990**

More information about the scheme can be found: Home : Operation Encompass

Children affected by domestic abuse | Barnardo's

Child Exploitation (CE)

Child Exploitation is an umbrella term which covers the two commonly known types of exploitation, child criminal exploitation (CCE) and child sexual exploitation (CSE).

All Saints' recognises that all forms of child exploitation are criminal. For the purposes of this policy, we will define CCE and CSE.

Child Criminal Exploitation (CCE) is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence (this could be online or through technology)

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines
- Working in cannabis factories

- Shoplifting or pickpocketing
- Committing vehicle crime
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual as it is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them. The school will also recognise that pupils of **any gender** are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Appearing with unexplained gifts, money or new possessions.

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the National Referral Mechanism by first responders should be considered in addition to normal safeguarding procedures. School would liaise with a 'First responder Organisation' as details in part 4 of the guidance, to support and request a referral to the NRM.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line, moving drugs, collecting money
- Being found in accommodation they have no connection
- Owing a ‘debt bond’ to their exploiters
- Having their bank account used to facilitate drug dealing.

LOW-LEVEL CONCERNS ABOUT AN ADULT WORKING IN OR ON BEHALF OF THE SCHOOL

All concerns must be reported without delay to the Headteacher. In their absence, it must be reported to Alison Montgomery, Deputy Headteacher

Name	Role	Contact Number
Francesca Lord	Headteacher	01706 213 693

If the allegation or concern relates to the Headteacher, it should be reported, without delay, to the Chief Executive of Romero Catholic Academy Trust.

Name	Role	Contact Number
Katy Cox	Chief Executive Officer Romero Catholic Academy Trust	01282-855500

APPENDIX B – CURRICULUM

All Saints' recognises that online safety is a safeguarding issue and an integral part of its safeguarding arrangements. The All Saints' is committed to creating a safe online environment and will have due regard to Keeping Children Safe in Education, relevant statutory guidance and its Online Safety Policy.

Technology is a significant component in many safeguarding and wellbeing issues, and children and young people can be exposed to abuse, exploitation and harm online as well as offline. Staff will be aware of a range of online risks, including child-on-child abuse, cyberbullying, online grooming, exploitation, harmful content, cybercrime, financially motivated sexual extortion (sextortion), harmful online communities and communication (COM) groups, radicalisation, misinformation, disinformation and the misuse of artificial intelligence (AI). Staff will remain vigilant to emerging online trends and concerns and will respond in line with the school's safeguarding procedures and relevant national guidance.

As part of a broad and balanced curriculum, children and young people will be taught about online safety and the safe, responsible and respectful use of technology. This will include understanding and managing risks associated with the four areas of online risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

APPENDIX C FILTERING AND MONITORING

The school uses the following filtering and monitoring system: Netsweeper

Classroom Cloud is monitored daily by Hannah Laverty

The school's E-Safety/Online Safety Lead is: Hannah Laverty

The All Saints' will ensure that appropriate filtering and monitoring systems are in place on ALL school and college owned devices, systems and networks, including desktop computers, laptops, tablets, mobile devices and internet-enabled technology. An annual review of filtering and monitoring systems will take place with Mr Senior (Network Manager) and the DSL to ensure they remain effective, proportionate and appropriate to the safeguarding needs of children and young people. This will be shared with the Governing Body / Board of Trustees .Any inappropriate access, behaviour, activity or searches identified through filtering and monitoring systems will be responded to promptly and managed in accordance with the school's safeguarding procedures.

Staff will be aware that filtering and monitoring systems are only one part of the school's approach to online safety. Effective safeguarding also requires ongoing staff vigilance, professional curiosity, education, supervision and appropriate intervention where concerns are identified. Staff must not rely solely on technology to safeguard children.

The All Saints' will maintain appropriate communication with parents and carers to reinforce online safety messages and support them in understanding how children access and use online services, digital technologies and devices safely inside and outside of school.

All staff will understand their roles and responsibilities in relation to online safety, including the school's filtering and monitoring arrangements, and will know how to identify, respond to and escalate concerns. Staff will receive information regarding filtering and monitoring as part of induction and through regular safeguarding updates. The All Saints' will ensure that it meets the filtering and monitoring standards published by the DfE.

The All Saints' will ensure that staff remain aware of emerging online risks, trends and technologies, including those involving artificial intelligence (AI), online communication

platforms and groups, online exploitation, cybercrime and other emerging safeguarding concerns. All Saints' is aware of the DfE guidance on the Generative Use of AI in Education 2025 and where Generative Artificial Intelligence (AI) tools are used within the school or college, leaders will ensure that all staff understand the associated safeguarding, privacy, data protection, online safety and professional conduct considerations. Staff will be supported through appropriate guidance, training and policies to ensure the safe, appropriate and lawful use of AI technologies.

Where the All Saints' becomes aware of an online safety incident that has occurred outside of the setting, it will be managed in accordance with the Child Protection and Safeguarding Policy, Online Safety Policy and Behaviour Policy, where appropriate.

Further information regarding the school's approach to online safety, including filtering and monitoring arrangements, can be found within the Online Safety Policy [Insert link]

Online safety relating to remote education, virtual lessons and live streaming

Where remote education is used, All Saints' will ensure appropriate safeguarding arrangements are in place and will follow current Department for Education guidance on safeguarding and remote education. Parents and carers will be supported to understand how children access online learning, the platforms being used and the measures in place to help keep children safe online. Safeguarding and remote education - GOV.UK and Providing remote education: guidance for schools - GOV.UK

APPENDIX D GENDER QUESTIONING CHILDREN

GENDER QUESTIONING CHILDREN – GUIDE

IN FORCE 1 SEPTEMBER 2026 - *NEW SECTION IN KCSIE 2026 — MUST BE IMPLEMENTED BEFORE THE NEW TERM*

WHAT KCSIE 2026 SAYS	YOUR STEP-BY-STEP PROCESS	DSL PROTECTION & KEY REMINDERS
Schools should not initiate social transition. This only applies when a child or parent raises a request. Parents should normally be involved unless doing so would place the child at risk of harm. The threshold is high. Schools should approach with professional curiosity, considering the child's experiences and vulnerabilities. All decisions must be clearly recorded. What counts as social transition? • Changes to name or nickname • Changes to pronouns • Changes to uniform or appearance **NONE OF THESE SHOULD BE INITIATED BY SCHOOL. THE CHILD OR PARENT MUST RAISE IT FIRST.** **Single-sex facilities** A child may not use facilities for the opposite biological sex. Where a child does not wish to use their biological sex facilities, consider whether an alternative can be provided without compromising the safety or dignity of any other child. Log it.	**1. A request is made** A child or parent raises it. You do not. Log immediately on CPOMS under 'Gender Questioning'. **2. Involve the DSL immediately** Every case must involve the DSL from the first conversation. No decisions without DSL involvement. **3. Explore with professional curiosity** Listen carefully. Consider age, maturity, vulnerabilities and context. This is a skilled conversation, not a form. **4. Consider parental involvement** Parents should normally be involved. Is there a specific, evidenced safeguarding reason not to? If yes — record it precisely. **5. Consult and decide as a team** No single person decides. Involve your Headteacher, DSL and contact Rebecca Birtwistle before agreeing to any change. **6. Record everything clearly** Every discussion, decision and reason on CPOMS. Vague notes are not enough. Be specific.	**ALWAYS DO** - Wait - never initiate. Let the child or parent raise it - Involve the DSL from the very first conversation - Record every discussion, decision and reason on CPOMS - Involve parents unless there is a specific, recorded reason not to - Contact Rebecca Birtwistle before agreeing to any change - Consider age, maturity and vulnerabilities **NEVER DO** - Initiate or suggest social transition to a child or family - Make decisions without DSL involvement - Exclude parents without a specific, evidenced, written reason - Allow use of facilities for the opposite biological sex - Make verbal decisions — everything must be in writing **CPOMS: LOG EVERY CONTACT, CONVERSATION, DECISION AND REVIEW DATE UNDER THE GENDER QUESTIONING CATEGORY.** NEED SUPPORT? Contact Rebecca Birtwistle Head of Safeguarding.

APPENDIX E - FOUR CATEGORIES OF ABUSE

PHYSICAL ABUSE

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

INDICATORS OF ABUSE

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty.

For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A CHILD WHO IS BEING ABUSED, NEGLECTED OR EXPLOITED MAY:

- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing for PE or swimming
- Look unkempt and uncared for
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful

- Be reckless with regard to their own or other's safety
- Self-harm
- Frequently miss school, arrive late or leave school for part of the day
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- Challenge authority
- Become disinterested in their work
- Be constantly tired or preoccupied
- Be wary of physical contact
- Be involved in, or particularly knowledgeable about drugs or alcohol
- Display sexual knowledge or behaviour beyond that normally expected for their age
- Acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL decide how to proceed.