OUR LADY OF LOURDES

CATHOLIC MULTI-ACADEMY TRUST

Trust Safeguarding Policy 2026-2027

Nottingham Diocese Multi Academy Trusts

CATHOLIC SCHOOLS Moving Forward Together

Our Lady of Lourdes Mission Statement:

We are a partnership of Catholic schools.

Our aim is to provide the very best Catholic education for all in our community and so improve life chances through spiritual, academic and social development.
By placing the person and teachings of Jesus Christ at the centre of all that we do, we will:

- Follow the example of Our Lady of Lourdes by nurturing everyone in a spirit of compassion, service and healing
- Work together so that we can all achieve our full potential, deepen our faith and realise our God-given talents
- Make the world a better place, especially for the most vulnerable in our society, by doing ***'little things with great love'*** *St Thérèse of Lisieux*

Child Protection and Safeguarding Policy 2026-2027

Title of policy:	Trust Safeguarding Policy 2026
Author and policy owner in the Executive Team:	• Moira Dales (DCEO) Trust DSL (Designated Safeguarding Lead) • Steve Akers (Safeguarding Manager) Trust DDSL (Deputy Designated Safeguarding Lead)
Reviewer:	Sue Dryden - Trust Safeguarding Foundation Director
Normal review frequency:	Annual review
Version number:	1.1
Committee approval date:	14 October 2026
Trust Board approval date:	14 October 2026
Date of next review:	30 July 2027

Document review and editorial updates:			
Version control	**Date**	**Reason for Revision**	**Key revisions included**
1.1	**30.09.2026**	Implementation of DfE statutory guidance: *Information sharing to safeguard children and young people* (September 2026)	• Added the new statutory Information Sharing Duty under section 16LA of the Children Act 2004. • Clarified that relevant safeguarding information must be shared where the duty applies. • Updated wording on consent, confidentiality and Family Help to reflect the new legal position. • Added expectations for responding to information requests and recording information-sharing decisions. • Updated DSL and staff responsibilities and added the new statutory guidance

			to linked documents.

Contents

Our Lady of Lourdes Mission Statement: 2
Safeguarding Statement 7
1. Key Personnel 8
1.1 CMAT Key Personnel 8
1.2 Local Authority Key Personnel 8
2. The Headteacher responsibilities: 10
3. The Designated Safeguarding Lead (DSL) 10
4. DSL Support 10
5. The DSL and Deputy DSLs 10
6. OLOL CMAT board responsibilities 11
7. Governors Responsibilities. 11
7.1 Safe Recruitment – interview panels. 11
8. Managing allegations and investigations 11
9. Definition of Safeguarding: 12
10. Our DBS checking process 12
11. An Effective Culture: 13
12. Definition of Child Protection: 14
13. Local Arrangements 14
13.1 Local Authorities with the Our Lady of Lourdes CMAT. 14
13.2 Local Authorities Safeguarding partnerships. 14
13.3 Child protection referrals (Refer to KCSIE). 15
13.4 How to record on CPOMs using the following guidelines. 15
13.5 Alternative Provision 16
13.6 Low Level Concerns about staff conduct. 17
13.7 The Local Authority Designated Officer (LADO) allegations against staff. 18
13.8 Child at risk of harm: 18
13.9 Whistleblowing and Safeguarding Concerns 18
13.10 Professional Disagreement and Escalation 19
13.11 Escalating Concerns Beyond the School 19
14. The 4 categories of abuse (KCSIE): 19
14.1 Abuse. 19
14.2 Physical abuse: (KCSIE). 19
14.3 Emotional abuse: (KCSIE). 19
14.4 Sexual abuse (KCSIE). 20
14.5 Neglect: (KCSIE). 20
15. Child on Child abuse: 20
15.1 Reporting systems for our children 21

15.2 Allegations of abuse made against other children. 22
15.3 Making, possessing and sharing of nudes and semi-nudes 22
15.4 Procedures for dealing with allegations of child-on-child abuse. 22
15.5 Minimising the risk of child-on-child abuse. 22
15.6 Staff Continued Professional Development (CPD) 23
15.7 Creating a supportive environment in school for all. 23
16. Filtering, Monitoring and online safety. 25
16.1 We do this by. 25
16.2 Online safety and the use of mobile technology 26
16.3 Artificial intelligence (AI) and Safeguarding 28
17. Female Genital Mutilation (FGM) 28
18. Prevent Duty. 28
18.1 Educate against hate. 29
18.2 Radicalisation. 29
18.3 Extremism. 30
18.4 Misinformation, Disinformation, and Conspiracy Content Online. 30
18.5 Terrorism. 30
18.6 Martyn's Law and Protective Security Procedures 30
18.7 Additional support for online abuse. 31
19. Homestay / Host Families and Exchange Visits 31
19.1 Linked policies: 31
20. Information an Data Protection 32
20.1 Safeguarding resources available to OLOL schools: 33
21. Right Help: Right time – Local Levels of Need Threshold Guidance: 33
21.1 All staff will: 33
21.2 Outline Levels of Need categories. 34
21.3 Early Intervention. 34
21.4 Family help Offer. 34
22. Our personal role in the recognition of needs, harm, neglect, abuse or exploitation: 35
22.1 Recognise. 35
22.2 Respond. 35
23. Staff training. 35
24. Roles and functions within our school: 36
24.1 Part 1 KCSIE. 36
24.2 Sign to acknowledge understanding of KCSIE. 36
24.3 All staff will be aware of. 37
25. Contractors, agency staff and volunteers. 37
25.1 Contractors - **Refer to KCSIE.** 37

25.2 Agency and third-party staff (supply staff). 38
25.3 Volunteers. 39
Appendix 1. Police and Criminal Evidence Act (1984) – Code C: 40
Appendix 2: How staff can report Low Level Concerns: 41
Appendix 3: Flow chart for raising safeguarding concerns about a child: 42
3.1 Actions where there are concerns about a child: 43
Appendix 4: Protocol for external speakers or organisations at Trust and in schools. 44
Appendix 5: Staffing Ratios and requirements for EYFS settings in schools. 46
Appendix 6: Prevent Risk Assessment. 48

Safeguarding Statement

Our Lady of Lourdes Catholic Multi Academy Trust (OLOL CMAT) Executive Board acknowledges its moral and statutory duty to safeguard and promote the welfare of all children, in collaboration with our Local Governing Bodies. Together, we are committed to creating a safe and welcoming environment where every child and adult is respected and valued.

The Trust Board and Local Governing Body adopt a 'whole school' approach to safeguarding, ensuring it is integrated into all aspects of our processes and policies. This commitment means that child protection is central to everything we do, with all systems, processes, and policies designed to operate in the best interests of the child. We are dedicated to ensuring equal protection for all children and young people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

Our mission, guided by the principles of Catholic Social Teaching, is to act in the best interests of children, ensuring their safety and providing them with full access to education. In line with the UN Convention on the Rights of the Child, we recognise that all adults, in any capacity, are duty-bearers, accountable for ensuring that children experience their rights.

In line with Working Together to Safeguard Children[1] (2026), the Trust adopts a whole-family and Family Help approach to safeguarding. We recognise that children's experiences are shaped by their wider family context and that early coordinated intervention improves outcomes and reduces risk.

It is crucial that everyone working in OLOL CMAT Schools and within the OLOL Central Team understands their safeguarding responsibilities. Governing bodies and proprietors will ensure that staff working directly with children read at least Part One of Keeping Children Safe in Education 2026[2] (KCSIE). **This will be completed through the online Flick training.**

For those who do not work directly with children, governing bodies and proprietors, along with senior leadership teams and Designated Safeguarding Leads (DSL), will ensure they read Part One of KCSIE. This will be completed through the online Flick training.

Mechanisms will be in place to help staff comprehend and fulfil their roles and responsibilities as outlined in Part One of KCSIE. The Trust Board and Local Governing Body remain vigilant to the signs of abuse, neglect and exploitation, following established procedures to ensure effective support, protection, and justice for children and adults. We recognise the unique needs and potential barriers faced by children from minority ethnic groups and those with disabilities, especially in communication.

Child protection is a fundamental component of our school's safeguarding responsibilities, ensuring that every child is protected and able to thrive in a safe educational environment. Child protection is part of safeguarding and promoting welfare. It refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

For the purposes of this policy, the terms 'children', 'pupils', and 'students' will all be referred to collectively as 'child' or 'children'. In line with Keeping Children Safe in Education (KCSIE), anyone under the age of 18 is considered a child.

The school Safeguarding and Child Protection policy is available on the CMAT website: Home - Our Lady of Lourdes Catholic Multi-Academy Trust (OLOLcatholicmat.co.uk)

[1] https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

[2] Keeping children safe in education - GOV.UK

1. Key Personnel

1.1 CMAT Key Personnel

The CMAT Designated Safeguarding Lead (DSL) is: Moira Dales DCEO
Contact details: email: m.dales@OLOLcatholicmat.co.uk Telephone: 07852133114

The CMAT Safeguarding Manager and Deputy Designated Safeguarding Lead is: Steve Akers
Contact details: email: s.akers@OLOLCATHOLICMAT.co.uk Telephone: 07356 130045

The CMAT foundation director for safeguarding is: Sue Dryden
Contact details: Telephone: 0115 8515454

1.2 Local Authority Key Personnel

Throughout the Safeguarding Policy, where it references safeguarding board and or partnership, please use the relevant link below.

LSCP
Lincolnshire Safeguarding Children Partnership – About the LSCP - Lincolnshire County Council

CMARS
CMARS | Children's resilience and safeguarding board (northlincscmars.co.uk)

NELSCB
https://www.nelincs.gov.uk/scp/

NCSCB
https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/safeguarding/

NSCP
https://www.nottinghamshire.gov.uk/nscp

DSCB
https://www.derbyshirescb.org.uk/news/new-multi-agency-safeguarding-arrangements-across-derby-and-derbyshire.aspx

Nottingham City Education Safeguarding Officer:
Contact details: email: safeguardingineducation@nottinghamcity.gov.uk
Telephone: 0115 876 2042

Nottingham City Designated Officer (LADO): Mona Cook and Jodie Turner
Contact details: email: LADO@nottinghamcity.gov.uk
Telephone: 0115 876 5166

Derbyshire County Safeguarding Officer: Ruth Hunter
Contact details: email: ruth.hunter@derbyshire.gov.uk
Telephone: 01629 537430

Derbyshire County Designated Officer (LADO):
Contact details: email: Professional.Allegations@derbyshire.gov.uk
Telephone: 01629 537430

Nottinghamshire County Education Safeguarding Officer: Zain Iqbal
Contact details: email: zain.iqbal@nottscc.go.uk
Telephone: 0115 8041047

Nottinghamshire County Designated Officer (LADO):
Contact details: email: LADO@nottscc.gov.uk
Telephone: 0115 8041272.

North Lincolnshire Education Safeguarding Officer: Sarah Stokoe
Contact details: email: sarah.stokoe@northlincs.gov.uk
Telephone: 07717 586534

North Lincolnshire Designated Officer (LADO):
Contact details: email: LADO@northlincs.gov.uk
Telephone: 01724 298293

Lincolnshire Education Safeguarding Officer: Miriam Shucksmith
Contact details: email: safeguardinginschools@lincolnshire.gov.uk
Telephone: 01522 554695

Lincolnshire Designated Officer (LADO):
Contact details: email: LSCP_LADO@lincolnshire.gov.uk
Telephone: 01522 554674

North East Lincolnshire Education Safeguarding Officer:
Contact details: email: nelcchildrensfrontdoor@nelincs.gov.uk
Telephone: 01472 326292

North East Lincolnshire Designated Officer (LADO):
Contact details: email: lado@nelincs.gov.uk
Telephone: 01472 326118

2. The Headteacher responsibilities:

The headteacher is responsible for the implementation of this policy, including: Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect or exploitation. Ensuring that this policy is clearly communicated to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update the content of this training regularly.
- Acting as the Case Manager for allegations against staff, volunteers and supply staff, where appropriate.

3. The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, the deputies will act as cover including out of hours and out of term activities.

4. DSL Support

The DSL will be given the time, funding, training, resources and support to:

- Liaise with the link DPS or the Trust Safeguarding Lead, for advice and support.
- Provide advice and support to other staff on child welfare and child protection matters.
- Provide advice and support to staff about information sharing, including the statutory Information Sharing Duty, and ensure that decisions to share or not share safeguarding information are appropriately recorded.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Ensure relevant requests for safeguarding information from other organisations are responded to appropriately and without unnecessary delay.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Report to LGB termly on the standard report template.

The DSL will also liaise with local authority case managers and designated officers for child protection concerns as appropriate.

In line with Keeping Children Safe in Education (2026), the Trust ensures that all Designated Safeguarding Leads (DSLs) have access to regular, structured safeguarding supervision. This provides a protected space for reflection, professional dialogue, and emotional support, enabling DSLs to manage the complex demands of safeguarding effectively. The process is outlined in detail within the Trust's Supervision Policy, which sets out expectations, frequency, and accountability arrangements. All Lead DSLs must engage in this supervision to strengthen safeguarding practice, ensure consistency, and uphold the highest standards of vigilance across our schools.
The full responsibilities of the DSL and deputies are set out in their job description.

5. The DSL and Deputy DSLs

Role of the Designated Safeguarding Lead.

The DSL and Deputy DSL will undertake appropriate child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

Availability
During term time the designated safeguarding lead (or a deputy) is always available (during school hours) for staff in our schools to discuss any safeguarding concerns. The designated safeguarding lead or a deputy would normally be expected to be available in person. In exceptional circumstances, they may be available by telephone, Teams or another suitable means. Our designated safeguarding lead will always arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

6. OLOL CMAT board responsibilities

The Trust Board will:

- Ensure a whole-school approach to safeguarding, ensuring it underpins all relevant processes and policy development.
- Review and approve this policy at each review, ensure it complies with the law, and hold the headteacher to account for effective implementation.
- Ensure there is a safeguarding lead to monitor the effectiveness of this policy alongside the full governing board. This person will not be the Designated Safeguarding Lead (DSL).

7. Governors Responsibilities.

Governors will receive an updated safeguarding report at the end of each term. This report will be presented at the subsequent governing body meeting for review and discussion.

All Governors will regularly update learning about safeguarding, to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities i.e. support and challenge.

All governors will receive online training, through Flick online safeguarding training and face to face training provided by our Trust. All governors are expected to complete safeguarding training in order for them to be able to access the school environment.

7.1 Safe Recruitment – interview panels.

Governors will ensure that at every interview panel will include at least one member who has completed safer recruitment training. As a minimum, this training will cover the requirements of Keeping Children Safe in Education and align with local safeguarding procedures.

8. Managing allegations and investigations

Please refer to OLOL Managing allegations protocol – see the Compliance Portal

Our Lady of Lourdes CMAT policies and procedures state clearly and explicitly to whom allegations are reported, and that reporting happens without delay, in line with local safeguarding procedures.

An Investigating Manager will be appointed to lead any investigation.

Employee Level	**Investigating Manager**
School support staff	A person appointed by the headteacher
Teaching Staff	Headteacher
Headteacher	CEO or person nominated by the CEO

Staff in Central Team (other than Executive Team)	Line Manager
CMAT Executive Team (other than CEO)	CEO or person nominated by the CEO
CEO	Investigating officer appointed by the Chair of the CMAT Board

All governors will read Keeping Children Safe in Education. Section 15 of this policy has information on how governors are supported to fulfil their role.

This policy works alongside our Trust's whistle blowing policy.[3]

9. Definition of Safeguarding:

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. This applies to **all children** in our care and in our communities.

Safeguarding is everyone's responsibility.
Safeguarding concerns rarely occur in isolation. Abuse, neglect, exploitation and other safeguarding issues often overlap and require a coordinated, child-centred response.

Safeguarding means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care.
- Recognising that abuse, neglect and exploitation are often interconnected and may occur alongside other safeguarding issues.
- Taking action to enable all children to have the best outcomes.

We are especially alert to any child who:

- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
- Has a parent or carer in custody, or is affected by parental offending.
- Is frequently missing/goes missing from education, home or care.

Safeguarding practice within our schools is child-centred, trauma-informed and focused on achieving the best outcomes for children. We recognise the importance of listening to children, understanding their lived experiences, and responding to concerns with professional curiosity and compassion.

10. Our DBS checking process

Our Lady of Lourdes is committed to safer recruitment and to safeguarding and promoting the welfare of children. We ensure all appropriate checks are carried out on staff, volunteers, governors, trustees, agency and third-party staff and contractors, in line with Keeping Children Safe in Education, the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012, the Rehabilitation of Offenders Act 1974 (Exceptions Order), and data protection legislation.

Types of checks

- **All OLOL Staff:** An Enhanced DBS with children's barred list is required for anyone engaging in regulated activity with children (e.g. regular unsupervised teaching, training, care, supervision, or intimate and personal care).

[3] Whistleblowing Policy - July 2023.docx

- **Volunteers:** From 1 September 2026, the Crime and Policing Act 2026[4] removes the supervision exemption for volunteers. This means that volunteers who teach, train, instruct, care for or supervise children may be undertaking regulated activity even when supervised by school staff. Regulated activity includes work carried out on more than three days in any 30-day period (whether in one school or cumulatively across multiple schools or settings) and any overnight activity involving children. Volunteers undertaking regulated activity must have the appropriate children's barred list check completed before undertaking that activity, and an Enhanced DBS certificate must be obtained in accordance with KCSIE.

Other statutory checks

- In line with KCSIE, we ensure the Right to Work in the UK, Prohibition from Teaching, Section 128 direction (management), Qualified Teacher Status, Overseas checks (including Certificates of Good Conduct for individuals who have lived or worked overseas).

Renewal and Update Service

- Checks are completed pre-appointment and before unsupervised access to children.
- We conduct annual status checks which are recorded.

Positive disclosures

- Any information returned on a DBS certificate is considered via a documented risk assessment by senior leaders and HR. Appointments proceed only where it is safe and lawful to do so.

Single Central Record (SCR)

- We maintain a compliant SCR that records identity, qualifications, DBS details, barred list checks, prohibition and Section 128, right-to-work, and required overseas checks for all relevant individuals, in line with KCSIE.

Supervision

- From 1 September 2026, supervision can no longer be relied upon to remove an individual from regulated activity or instead of obtaining the appropriate DBS check.
- Any adult visiting a school who is not engaged in regulated activity should be treated as a visitor, unless they can provide a full Enhanced DBS check with barred list check or are covered by a satisfactory letter of assurance eg social care, CAMHS etc.
- Visitors should be supervised at all times.

Data protection

- We handle DBS data in line with UK GDPR and the Data Protection Act 2018. Certificate information is seen only by authorised staff, recorded minimally (e.g. number/date/level/outcome), and retained securely for no longer than necessary.

Duty to refer

- We will make a referral to the DBS and, where applicable, the Teaching Regulation Agency (TRA) when we remove or would have removed an individual from regulated activity because they posed a risk of harm to children.

11. An Effective Culture:

Leaders must create a culture in which all staff, trustees and visitors understand how to raise concerns and feel supported to do so.

Our schools will promote an inclusive, anti-discriminatory culture where racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

[4] Crime and Policing Act 2026 - GOV.UK

Governors should ensure that they have a clear understanding of the local risks that are applicable to the demographic of the school.

Governors should ask challenging questions of leaders' assertions and 'triangulate' these assertions more thoroughly so that they understand what behaviour is like.

So that we are able:

- To reduce risk and prevent harm to children.
- To ensure the identification of, and timely and appropriate responses to, risk and harm to children.
- To ensure that all adults in the school community understand their roles and responsibilities in respect of the above.

Our school provides a universal service to children in our locality. School staff are closely involved, daily, with children and their families. Consequently, we have a critically important role towards the identification and prevention of harm, abuse, neglect or exploitation.

This policy does not reiterate extensive sections of statutory guidance. It is a practical document that clarifies the roles and duties of **all adults** working in our schools and school communities. It should be used in conjunction with Keeping Children Safe in Education (2026), Working Together to Safeguard Children and with related school and Trust policies, as specified in section 19.1 of this policy.

We welcome our personal and professional safeguarding responsibilities, and as set out in statutory guidance. It is our duty to maintain a professional working knowledge of relevant statutory guidance and of local arrangements.

12. Definition of Child Protection:

'Child protection' is the activity to protect specific children who are suffering, or who are likely to suffer, significant harm. Therefore, protection is a specific element of safeguarding, whereas safeguarding legislation in general is about the promotion of children's needs and the prevention of harm. This emphasises the need for all staff to be able to respond early when they have a concern rather than wait until this is more defined and certain.

At this point the involvement of services to protect the child (ren), including Children's Social Care, is statutory.

The critical message from legislation that should inform all actions and decisions is that:

"The child's welfare is paramount".

13. Local Arrangements

13.1 Local Authorities with the Our Lady of Lourdes CMAT.

Our Lady of Lourdes spans six local authority areas. Each local area's multi-agency safeguarding arrangements are led by the statutory safeguarding partners/organisations: local authorities, clinical commissioning groups and the police.

13.2 Local Authorities Safeguarding partnerships.

LSCP (Lincolnshire) CMARS (North Lincolnshire), NELSCB (Northeast Lincolnshire), NCSCB (Nottingham City), NSCP (Nottinghamshire), DSCB (Derbyshire): Statutory Child Protection Procedures; Regional Safeguarding Guidance; Local Area Specific Safeguarding Information and Procedures.
With respect to the Local Area Specific Safeguarding Information and Procedures, please choose use the link in the Key Local Authority Key Personnel page, of this document.

13.3 Child protection referrals (Refer to KCSIE).

Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests** of the child.

When staff have any concerns about a child's welfare, they should act on them **immediately**. **See appendix 3** for a flow chart setting out the process for staff when they have concerns about a child.

Where appropriate, schools will work within a Family Help approach to ensure children and families receive coordinated support at the earliest opportunity. Staff understand that safeguarding intervention should not be delayed while awaiting disclosure or certainty of harm.

Information sharing is not dependent on a concern reaching the threshold for statutory child protection intervention. Where information is relevant to safeguarding or promoting the welfare of a child and the statutory Information Sharing Duty applies, the school must share that information with the appropriate relevant organisation. This includes information relating to emerging need, prevention and Family Help. Consent from a child or parent is not required in order to share information under the statutory duty, although families should normally be informed about what is being shared and why where it is safe and appropriate to do so.

Any safeguarding concern or disclosure will be reported immediately to the DSL and assessed without delay. Where the threshold is met, an immediate referral will be made to Children's Social Care. Any decision not to refer must be carefully recorded on CPOMs
Schools will:

1) Ensure that the information is recorded on CPOMs and the DSL is alerted.
2) Referral to be made immediately to social care with dates and times.
3) Evidence of all phone calls (including those to parents, social care or advice lines), emails or other information factually recorded.
4) Outcomes of any decisions regarding the referral recorded.

13.4 How to record on CPOMs using the following guidelines.

Staff must ensure that the child's voice is clearly reflected within safeguarding records wherever possible. Records should demonstrate what the child said, how they presented, what actions were taken, and the rationale for decision-making. Any decision not to refer should also be carefully recorded.

✅ **DO**	❌ **DON'T**
Always use full names (e.g. John Smith, not JS).	Use initials, nicknames or pseudonyms.
Always write in the first person (e.g. *I contacted social care at… They advised me to…*).	Do not use the third person or detached language.
Always record accurately where and when the incident took place (e.g. *Classroom 1, 13:24*).	Do not add unnecessary contextual detail (e.g. *After break time before they had their milk but before I took my coat off…*).
Ensure referrals follow the correct procedure: the DSL makes the initial phone referral, then sends the Multi-Agency Safeguarding referral form via email immediately afterwards.	Do not assume only the DSL can make a referral – if necessary, any staff member can and should make one.
Inform the child and parents, where safe and appropriate to do so, that information is being shared or a referral is being made, and explain why.	Do not inform the child or parents if it would increase the risk to the child.

✅ DO	❌ DON'T
If after a referral the situation doesn't improve, press for re-consideration with social care or the Local Authority Designated Officer.	Do not stop from following up your referral if you believe the child's situation is not improving.
Make an immediate referral to social care and/or the police if a child is in danger or at risk of harm.	Do not delay referrals in urgent situations – anyone can refer to the police or Social Care immediately.
If a referral is made by someone other than the DSL, inform the DSL as soon as possible.	.
Use factual, neutral language only.	Do not use emotive language (e.g. *I was terrified about upsetting the parents…*).
Record only facts and observations.	Do not include personal opinions (e.g. *The child appeared fine…*).
Record decisions to share or not share safeguarding information, including what was shared, with whom, why it was relevant and the rationale for the decision.	Do not treat lack of consent as a reason in itself not to share information where the statutory duty applies.

13.5 Alternative Provision

Please refer to OLOL Alternative Education Pathways Policy

When our school places a child with an Alternative Provision (AP) provider, we retain full responsibility for the safeguarding and welfare of that child.

Monitoring of safeguarding, attendance, and welfare at AP placements takes place at least half-termly, or more frequently where risk or need requires. This includes direct contact with the child and communication with the AP provider to ensure safeguarding standards are upheld.

We ensure that:

- The placement is appropriate and meets the individual needs of the child;
- Written assurance is obtained from the provider that appropriate safeguarding checks have been completed on relevant staff;
- The provider will inform the school of any changes, including staffing changes, which may affect safeguarding arrangements;
- The school will maintain an accurate record of where the child is based during school hours, including the address of any subcontracted provision or satellite site attended.
- Safeguarding arrangements at the AP provider are robust, including safer recruitment, child protection policies, and access to a trained Designated Safeguarding Lead;
- There is ongoing monitoring of the child's attendance, engagement, progress, and well-being;
- A named member of school staff maintains regular contact with the child and the AP setting;
- **Half-termly checks or visits** are undertaken to ensure welfare, progress, attendance, and safeguarding arrangements.
- Monitoring will include checking CPOMs entries, welfare logs, attendance, behaviour reports, and communication with the provider and child.

Our school follows the statutory guidance:

- Alternative provision (DfE) – Alternative provision - GOV.UK
- Education for children with health needs who cannot attend school – Education for children with health needs who cannot attend school - GOV.UK

These responsibilities are reflected in our separate Alternative Provision Policy, which ensures that safeguarding remains a core priority for all off-site placements.

The Trust recognises that safeguarding responsibilities extend to all pupils placed in Alternative Provision (AP). In line with the Alternative Education Pathways Policy, schools should only use Ofsted-registered providers; the use of unregistered or non-registered AP will only be considered in exceptional circumstances, on a case-by-case basis,

and must be approved by the link Director of Performance and Standards (DPS). Where a non-registered provider is used, schools must complete all required risk assessments, safeguarding checks, and monitoring processes to ensure that pupils remain safe and their welfare is protected at all times. The school retains full responsibility for safeguarding and child protection for any pupil in AP, whether provision is registered or unregistered.

13.6 Low Level Concerns about staff conduct.

See Appendix 2, to support staff to report a low-level concern.

1. Allegation against a member of staff (inclusive of EYFS, supply/agency staff and 6th Form) report to the headteacher.
2. Ensure all LADO allegations are discussed with the DPS team first **unless the child is at immediate risk of harm or if a criminal act has taken place – see the table below.**
3. Allegation against the headteacher report to James McGeachie CEO.
4. Anyone can report any concern to their LADO.
5. When school receives an allegation relating to an incident where an individual or organisation was using your school premises for running an activity for children, you should report it to the Head Teacher and inform the local authority designated officer (LADO)

A **low-level concern** is any concern – **no matter how small** – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- Does not meet the threshold for harm or risk of harm to a child;
- Nevertheless, raises concern about a staff member's behaviour, integrity, or judgement.

Actions by adults in your workplace that might make you have doubts or feel uncomfortable:

- A staff member's interactions with children of any age.
- The way a staff member behaves towards a parent.
- The way a staff member reacts to you or another staff member.
- Being over-friendly with students
- Showing favouritism
- Spending time alone with a child in a secluded area or behind a door
- Using inappropriate or intimidating language
- Ridiculing a child in front of others
- Displaying aggression towards certain children.

Purpose

- The purpose of having a robust low-level concerns process is to:
- Foster a culture of openness, trust and transparency;
- Encourage staff to share concerns no matter how small;
- Address issues early before they potentially escalate;
- Identify concerning patterns of behaviour at the earliest opportunity.
- Ensure behaviour is consistent with the school's safeguarding ethos and the Teachers' Standards.

Remember: **reporting concerns keeps children and colleagues safe.**

Reporting a Low-Level Concern (See Appendix 2).

- All staff have a responsibility to report low-level concerns. Concerns about a member of staff will be:
    - Shared with the Headteacher via reporting concerns, either in person or through this link, https://tinyurl.com/4vur2e65.
        - Staff will report this using their **work email address** or in person to the headteacher.
        - Any records that are sent without the correct email; will be received by the Trust safeguarding lead.
    - Treated with sensitivity, objectivity, and confidentiality.
- **If in doubt about whether behaviour meets the "low-level" threshold, staff should still report it.**

- Concerns regarding the headteacher will be reported directly to James McGeachie (CEO) j.mcgeachie@OLOLcatholicmat.co.uk

Record Keeping and Oversight

- All low-level concerns will be recorded and stored securely by the Headteacher.
- Records will include the nature of the concern, context, actions taken, and rationale.
- Records will be reviewed periodically to identify patterns or repeat concerns about individuals.
- Patterns may indicate that behaviour has moved beyond the low-level concerns threshold and requires formal consideration.
- If a pattern of low-level concerns emerges, this may trigger disciplinary procedures or a referral to the LADO.

13.7 The Local Authority Designated Officer (LADO) allegations against staff.

When you are concerned that an adult working with children may have harmed a child or placed a child at risk of harm, please refer to the managing allegations against staff protocol. This provides details about when to contact the LADO.

Anyone can contact the Local Authority Designated Officer (LADO) directly if they have concerns about an adult working with children. In line with Keeping Children Safe in Education (KCSIE), staff are reminded that they do not need to wait for permission or follow internal processes before making a referral if they believe a child is at risk of harm.

13.8 Child at risk of harm:

While the Safeguarding Team and the Directors of Performance and Standards (DPS) Team are available to support and advise you, all staff must take immediate action if they suspect that an adult has harmed, or may have harmed, a child or placed a child at risk of harm. In such cases, concerns must be reported without delay to the Headteacher or directly to the Local Authority Designated Officer (LADO) in accordance with the school's safeguarding procedures and Part 4 of KCSIE.

1.	Report any cases of immediate risk to the police
2.	Report the risk to Social Care
3.	Contact the LADO
4.	Finally contact HR and Steve Akers (Safeguarding Manager)

CEO	**James McGeachie**	**j.mcgeachie@OLOLcatholicmat.co.uk**
DCEO	**Moira Dales**	**m.dales@OLOLcatholicmat.co.uk**
HR	Gemma Tovey	g.tovey@OLOLcatholicmat.co.uk
DPS	Deborah Tibble	d.tibble@OLOLCATHOLICMAT.co.uk
DPS	Tracy Lane	t.lane@OLOLCATHOLICMAT.co.uk
DPS	Lisa Floate	l.floate@OLOLCATHOLICMAT.co.uk
Safeguarding Manager	Steve Akers	s.akers@OLOLCATHOLICMAT.co.uk

13.9 Whistleblowing and Safeguarding Concerns

Our school is committed to creating an open culture where staff feel confident to raise concerns about poor or unsafe safeguarding practices, in line with the Whistleblowing Policy and KCSIE. Staff are encouraged to raise concerns internally with the senior leadership team or the designated safeguarding lead.

Where concerns cannot be raised internally or have not been adequately addressed, staff can contact the NSPCC Whistleblowing Advice Line for confidential support. This independent helpline is available for professionals who do not feel able to raise safeguarding concerns through their organisation. Staff can call 0800 028 0285 or email help@nspcc.org.uk. This service reinforces the school's commitment to transparency, accountability, and the highest safeguarding standards.

Our Lady of Lourds Whistleblowing policy is located:

13.10 Professional Disagreement and Escalation

In line with *Keeping Children Safe in Education (KCSIE) 2026*, staff have a professional duty to raise concerns and challenge safeguarding decisions when they believe a child is at risk or may be at risk, or where there is disagreement over how best to protect a child. Constructive professional challenge is an essential part of effective multi-agency working and safeguarding culture.

All staff must feel confident to escalate concerns internally and externally, using the school's safeguarding escalation procedures. This includes:

- Raising concerns directly with the Designated Safeguarding Lead (DSL) or senior leadership team.
- Using the Trust's whistleblowing policy.
- Contacting children's social care directly if staff believe appropriate action is not being taken.

No staff member should be discouraged from speaking up due to hierarchy, role, or fear of repercussions. The child's safety must always come first.

13.11 Escalating Concerns Beyond the School

Where the school, including the DSL and Headteacher, disagrees with the response or decision of an external agency (e.g. children's social care), professional challenge and escalation must continue until there is confidence that the child is safe. This includes situations where the school believes a referral has been wrongly declined, or that the child's needs are not being appropriately assessed or met.

In such cases, the school should:

- Follow the local safeguarding partnership's escalation protocol.
- Keep a clear written record of all discussions, decisions, and attempts to escalate.
- Inform the Trust Safeguarding Manager or Lead where appropriate.
- Seek advice from the Local Authority Designated Officer (LADO) or safeguarding hub if concerns persist.

All decisions must prioritise the welfare of the child. Disagreement with external agencies should never delay urgent safeguarding action.

14. The 4 categories of abuse (KCSIE):

14.1 Abuse.

Abuse is maltreatment of a child by adults or other children, through action or inaction. Issues often overlap. Staff will be alert to indicators such as drug or alcohol misuse, persistent or unexplained absence, serious violence (incl. county lines), radicalisation, and sharing of nude or semi-nude images and or videos.

14.2 Physical abuse: (KCSIE).

Acts causing physical harm, e.g. hitting, shaking, throwing, poisoning, burning and or scalding, drowning, suffocating, or fabricating inducing illness.

14.3 Emotional abuse: (KCSIE).

Persistent emotional maltreatment harming development; may occur alone and is present in all forms of abuse. Examples include:

- Making a child feel worthless and unloved, mocking or silencing their views.
- Age or developmentally inappropriate expectations, overprotection, or limiting social interaction.
- Seeing or hearing ill-treatment of others
- Serious bullying (incl. cyberbullying), exploitation or corruption
- persistent criticism
- humiliation
- belittling
- rejection

- scapegoating
- name-calling

14.4 Sexual abuse (KCSIE).

Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities, whether or not the child is aware of what is happening:

- Contact through penetration (e.g. rape, oral sex) and non-penetrative acts (e.g. masturbation, kissing, rubbing, touching over clothing)
- Non-contact by viewing and or producing sexual images, watching sexual activities, encouraging sexualised behaviour, grooming (incl. online)
- Perpetrators can be adults or children, of any gender
- assault by penetration
- sexual assault
- causing or inciting a child to engage in sexual activity
- sexual exploitation
- grooming
- abuse occurring online as well as in person

Children are more likely to know their abuser than not. Children under 13 can never provide valid consent to sexual activity. Sexual activity with a child under 16 is an offence regardless of whether they agreed to that activity.

14.5 Neglect: (KCSIE).

Persistent failure to meet basic physical and psychological needs, likely to seriously impair health and development; may begin prenatally (maternal substance misuse).
Can include:

- Inadequate food, clothing, shelter (incl. exclusion and or abandonment).
- Failure to protect from physical and or emotional harm or danger.
- Inadequate supervision (incl. unsuitable caregivers).
- Failure to ensure medical care and or treatment.
- Neglect of basic emotional needs.

15. Child on Child abuse:

- **All** staff will recognise that children are capable of abusing their peers (including online).
- **All** staff are clear about our school's policy and procedures with regard to child-on-child abuse.

All staff will recognise that racism, faith-targeted abuse and other forms of discriminatory behaviour may significantly affect a child's welfare, wellbeing and sense of safety and will be considered within safeguarding practice where appropriate.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Governing bodies and proprietors will ensure that these systems are in place:

- procedures to minimise the risk of child-on-child abuse;
- the systems in place (and they will be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously;
- how allegations of child-on-child abuse will be recorded, investigated and dealt with;

- clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported;
- a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported;
- staff will challenge inappropriate or harmful language or behaviour including misogynistic and dismissive attitudes such as 'just banter' or 'boys being boys,' as these may contribute to a culture that normalises abuse;
- whilst any report of sexual violence or sexual harassment will be taken seriously, staff are aware it is more likely girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers, but that all child-on-child abuse is unacceptable and will be taken seriously; and
    - the different forms child on child abuse can take, such as:
    - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
    - discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents;
    - abuse in intimate personal relationships between peers;
    - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
    - sexual violence and sexual harassment. **Part five of KCSIE** guidance and Sexual violence and sexual harassment between children in schools and colleges sets out how schools and colleges will respond to reports of sexual violence and sexual harassment;
    - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos the policy will include the school or college's approach to it. The Department provides Searching Screening and Confiscation Advice for schools. The UKCIS Education Group has published Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes and semi-nudes being shared;
    - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexualactivity with a third party
    - upskirting (which is a criminal offence[5]), which typically involves taking a picture under a person's clothing without their permission, with the intention ofviewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
    - Initiation/hazing-type violence and rituals (including activities involving harassment, abuse, or humiliation used to initiate children into groups, including online environments).
    - misogyny
    - violence against women and girls (VAWG)
    - abusive behaviour based on biological sex
    - abuse relating to gender questioning
    - prejudice-based abuse

Staff understand that harmful behaviour displayed by children may indicate that they themselves are vulnerable or experiencing abuse, neglect or exploitation. Responses to child-on-child abuse will therefore balance accountability, safeguarding and appropriate support for all children involved.

15.1 Reporting systems for our children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Each school has systems in place for children to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children

[5] Voyeurism (Offences) Act 2019 (legislation.gov.uk)

- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

To ensure that children feel comfortable to report concerns:

- Each school has reporting systems for children, all children know they can talk to any trusted adult in school to report anything that makes them feel unsafe, uncomfortable or safeguarding related.
- All schools make children aware of the reporting systems and processes, through discussion in their relationships/sex education curriculum
- children feel safe raising concerns, as all schools provide reassurance and support after any disclosures.

15.2 Allegations of abuse made against other children.

We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put children in the school at risk
- Is violent
- Involves children being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos including the sharing of nudes or semi-nudes, including AI-generated or AI-manipulated nude or semi-nude images.

The law changed in February 2023: any form of marriage for someone under 18 is illegal, even where violence, threats or another form of coercion are not used.

15.3 Making, possessing and sharing of nudes and semi-nudes

Please refer to our online safety policy. Our approach is based on guidance from the UK Council for Child Internet Safety (https://www.gov.uk/government/organisations/uk-council-for-internet-safety)

15.4 Procedures for dealing with allegations of child-on-child abuse.

- When a child makes an allegation of abuse against another child:
  You must record the allegation on CPOMs and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police when the allegation involves a potential criminal offence.
- **Schools will refer to local interagency arrangements.**

15.5 Minimising the risk of child-on-child abuse.

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female children, and initiation or hazing type violence that might impact, more typically, on boys
- Ensure our curriculum helps to educate children about appropriate behaviour and consent
- Ensure children are able to easily and confidently report abuse
- Ensure staff reassure victims that they are being taken seriously.

15.6 Staff Continued Professional Development (CPD)

We ensure staff are trained to understand.

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That when they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a child harming a child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL when they have any concerns.

15.7 Creating a supportive environment in school for all.

At Our Lady of Lourdes Catholic Multi-Academy Trust, we are committed to creating schools where every child feels safe, respected and valued. We recognise that some children may experience additional vulnerabilities because of their experiences, identity or personal circumstances. Our schools strive to foster a culture where every child knows they will be listened to, taken seriously and supported.

Being lesbian, gay or bisexual is not in itself a safeguarding concern or an indicator that a child is at risk of harm. However, children who are lesbian, gay or bisexual, or who are perceived by others to be so, may be more vulnerable to bullying, harassment, discrimination or abuse. Schools will respond promptly to any such concerns through their safeguarding, behaviour and anti-bullying procedures.

Gender Questioning Children

The Trust recognises that a small number of children may question their gender. Such children may experience increased vulnerability to bullying, social isolation, online harm, exploitation, poor mental health or other safeguarding concerns. Staff should respond sensitively, remain professionally curious and avoid making assumptions about a child's needs or circumstances.

The Trust recognises the findings of the Cass Review, which highlighted that many gender-questioning children present with wider vulnerabilities, including complex mental health needs, neurodiversity, adverse childhood experiences and other safeguarding concerns. Schools should therefore ensure that any safeguarding response considers the whole child rather than focusing solely on issues relating to gender.

Schools will respond to gender-questioning children on a case-by-case basis. Decisions should be evidence-informed, child-centred and based on an individual assessment of need, taking account of safeguarding, wellbeing, the child's wishes, parental responsibilities and the rights, privacy, dignity and safety of all children. A child may choose to speak to a trusted adult about questioning their gender without requesting any change to how the school supports them. Staff should listen carefully, offer appropriate support and follow safeguarding procedures where concerns arise. Where a child requests changes relating to social transition or day-to-day school arrangements, these should not be agreed by an individual member of staff. Significant decisions must be considered through the school's agreed safeguarding processes, led by the Designated Safeguarding Lead and, where appropriate, the Headteacher.

Parents and carers have the leading role in their child's upbringing and should normally be involved at the earliest opportunity where significant decisions are being considered. Their views should be given appropriate weight. Only in the exceptional circumstance where involving parents would place the child at risk of significant

harm should alternative arrangements be considered, under the direction of the Designated Safeguarding Lead and in accordance with safeguarding procedures.

Schools should not initiate social transition. Where support is requested, decisions should be made cautiously, recognising that social transition is an active intervention which may have significant and long-term implications for a child. Schools should seek appropriate clinical or professional advice where necessary and ensure that decisions remain under regular review. Particular caution should be exercised where pre-pubertal children are involved.

Practical Arrangements
The Trust expects all schools to ensure that practical arrangements safeguard the privacy, dignity and safety of every child whilst complying with current legislation and statutory guidance.

In accordance with statutory guidance:

- schools **must not** allow children to use toilets designated for the opposite biological sex;
- schools **must not** allow a child aged 11 years or over (at the start of the school year) to undress in front of a child of the opposite biological sex;
- schools **must not** permit pupils to use boarding or residential accommodation designated for the opposite biological sex.

Where a child does not wish to use facilities designated for their biological sex, schools should consider suitable alternative arrangements, such as access to an individual toilet, private changing facilities, separate changing times or other appropriate measures that protect the privacy, dignity and safety of both the individual child and the wider school community.

Schools should ensure that residential visits, overnight accommodation, changing facilities and showering arrangements are planned carefully and, where necessary, supported by an individual risk assessment.

Physical Education and Sport
Schools should organise physical education and sporting activities in accordance with current legislation, statutory guidance and the requirements of the relevant National Governing Body.
Where activities are organised on the basis of biological sex because this is necessary for safety or competitive fairness, schools should ensure that arrangements are implemented consistently whilst considering suitable alternative opportunities for participation where appropriate.

Safeguarding Practice
The Designated Safeguarding Lead should oversee significant safeguarding decisions relating to gender-questioning children.

Schools should ensure that:

- decisions are based upon the individual needs and circumstances of the child;
- safeguarding remains the paramount consideration;
- parental involvement is considered unless this would increase the risk of harm;
- appropriate professional advice is sought where necessary;
- the rationale for significant decisions is clearly recorded;
- arrangements are reviewed regularly and amended where circumstances change;
- relevant staff have access to the information they require to fulfil their safeguarding responsibilities, whilst maintaining appropriate confidentiality and complying with data protection legislation.

Schools should remain alert to children whose biological sex may not be widely known within the school community and ensure that safeguarding arrangements continue to protect both the individual child and other pupils.

Where a child wishes to amend or reverse previously agreed arrangements, schools should respond sensitively, maintain flexibility and review support in partnership with parents or carers and relevant professionals where appropriate.

Respect, Dignity and Inclusion
The Trust is committed to creating schools where every child is treated with dignity, compassion and respect. Bullying, harassment or discrimination directed towards any child because of their biological sex, sexual orientation, gender questioning or perceived identity will not be tolerated and will be addressed promptly through the school's safeguarding, behaviour and anti-bullying procedures.

Schools should recognise that they also have legal responsibilities under the Equality Act 2010 and Human Rights Act 1998. Decisions should seek to balance the welfare of the individual child with the rights, privacy, dignity and safety of all pupils and staff. Where differing protected rights arise, schools should act proportionately, seek appropriate advice where necessary and ensure that decisions remain evidence-informed, well-reasoned and appropriately recorded.

Online Safety
Staff should recognise that some children questioning their gender may seek information or support online. Whilst many online communities can provide positive support, others may expose children to harmful content, misinformation, coercive relationships, exploitation or extremist ideology.

Any safeguarding concerns arising from online activity should be managed in accordance with the Trust's safeguarding procedures.

16. Filtering, Monitoring and online safety.

We will ensure that suitable internet filtering and monitoring is in place and equip our children to stay safe online at school and at home.
Our schools meet the Department for Education's digital and technology standards, including the Filtering and Monitoring Standards revised in March 2025.

16.1 We do this by.

Filtering and monitoring system:	**How this meets the monitoring standards:**
We review your filtering and monitoring provision.	Dates for review: September 2026 The effectiveness of filtering and monitoring will be formally reviewed at least annually by the SLT member responsible for filtering and monitoring, supported by the DSL and IT support. The review will include checks that filtering operates appropriately on all internet-connected devices in all relevant locations, and a record of the review and checks will be retained. Termly meeting with IT to check filtering.
Our filtering system blocks harmful and inappropriate content, without unreasonably impacting teaching and learning.	We do this by: • Our filtering system is a member of Internet Watch Foundation (IWF) • They are signed up to Counter-Terrorism Internet Referral Unit list (CTIRU) • They block access to illegal content including child sexual abuse material (CSAM) All Staff will report when: • they witness or suspect unsuitable material has been accessed • they can access unsuitable material • they are teaching topics which could create unusual activity on the filtering logs

	• there is failure in the software or abuse of the system • there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks • they notice abbreviations or misspellings that allow access to restricted material
Our school's monitoring strategies meet our safeguarding needs.	We do this by: • The monitoring system reviews user activity on school and college devices effectively. • This allows us to take prompt action; and the response recorded on CPOMs.

16.2 Online safety and the use of mobile technology.

The Trust expects all schools to operate as mobile phone-free environments by default. Children must not use mobile phones or smart technology with similar functionality during the school day, including during lessons, transitions, breaktimes and lunchtimes.

For the purposes of this policy, mobile phones and smart technology include devices capable of sending or receiving messages, notifications, calls, images, video, audio recordings or accessing the internet. This includes smart watches and other wearable devices with similar functionality.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, all our schools:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of children, staff, volunteers and governors
- All staff understand the school's filtering and monitoring arrangements and know their role in ensuring online safety.
    - This includes recognising how inappropriate content, harmful websites, and online grooming may present risks to children.
    - Staff know how concerns are identified, who is responsible for monitoring systems, and how to escalate issues.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, possessing and sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

We recognise that online harms can rapidly escalate into significant safeguarding concerns, including exploitation, coercion, radicalisation, bullying, sexual abuse and criminal activity. Online safeguarding concerns will be treated with the same level of seriousness as offline concerns.

To meet our aims and address the risks above, we will:

- Educate children about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring children are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training, through flick, as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Parents and carers will be informed of the school's mobile phone expectations. During the school day, urgent communication between parents and children must take place through the school office.
- Make sure staff are aware of any restrictions placed on them with regard to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when children are not present.
    - Staff will not take pictures or recordings of children on their personal phones or cameras
- Make all children, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a child is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, children and parents/carers are aware that staff have the power to search children phones, as set out in the DfE's guidance on searching, screening and confiscation[6] and OLOL Searching and Confiscation policy.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

The Trust will continue to review mobile phone expectations in line with emerging national guidance and future legislative developments regarding children's access to smartphones and online platforms.

- Staff must not use personal mobile phones in pupil-facing areas unless there is an emergency or specific leadership authorisation. Staff must not use personal devices to photograph, film or record children.
- Staff must not use personal phones, messaging apps or social media to communicate with children. Communication must take place through approved school systems.

[6] Searching, screening and confiscation in schools - GOV.UK (www.gov.uk)

- Staff should use a school mobile phone when off-site with pupils on day trips or residentials.

16.3 Artificial intelligence (AI) and Safeguarding

Please refer to Our Lady of Lourdes Catholic Multi Academy Trust AI Charter.

Our school is committed to ensuring that the use of Artificial Intelligence (AI) within education is safe, ethical, and aligned with safeguarding standards. In line with the Our Lady of Lourdes Catholic Multi Academy Trust AI Charter, all AI tools must be used with human oversight, transparency, and accountability. The AI Charter is underpinned by four key pillars: ethical use and integrity, privacy and protection, inclusion and innovation, and workload reduction with efficiency.

Safeguarding remains central to all AI usage, no personal or identifiable data will be entered into AI platforms, and all tools must have a completed Data Protection Impact Assessment (DPIA). Staff are trained to apply professional judgment, mitigate bias, and ensure that AI-generated outputs do not compromise child protection or data security. AI is used to support teaching and leadership, not replace human decision-making, and its implementation will be regularly reviewed to ensure alignment with safeguarding responsibilities and the Trust's values of compassion, service, and integrity.

17. Female Genital Mutilation (FGM).

Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, **places a statutory duty on teachers to report to the police** where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. **This individual responsibility must not be delegated.**

18. Prevent Duty.

We protect children from the risk of radicalisation, as part of our wider safeguarding duties and duty to promote the spiritual, moral, social and cultural development of children.

Staff understand that vulnerability to radicalisation may arise from a combination of factors including isolation, online influence, grievance, exploitation, trauma, mental health concerns or exposure to extremist narratives.

If a member of staff suspects that a child is at risk of radicalisation, they ***will and must*** report this to the DSL. All Prevent concerns must be treated as safeguarding concerns. The DSL will assess the concern and decide whether a referral to the local Prevent team or Channel programme is required.

If concerns escalate or persist, the DSL will consider re-referral or multi-agency escalation.
Referral to the Prevent team or Channel programme is not a sanction or punitive measure. It is a supportive, safeguarding intervention designed to provide Family help/Early Help and protect individuals from being drawn into terrorism. Engagement with Channel is voluntary, confidential, and does not result in a criminal record or entry into the criminal justice system.

Anyone can seek advice by contacting the national Prevent helpline (0800 011 3764). Concerns should be shared with the DSL even where advice is sought anonymously.

See appendix 6 for links to the risk assessment templates

The objectives of Prevent are to:

- Tackle the ideological causes of terrorism.
- Intervene early to support people susceptible to radicalisation.
- Enable people who have already engaged in terrorism to disengage and rehabilitate.

To do this, our schools and central team staff will:

- Have due regard to the need to prevent people being drawn into terrorism.
- Promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs in our curriculum.

- Our schools and offices are a safe space for all children and staff to discuss sensitive topics, including terrorism and extremism.
- Our staff 'create a culture' where children can speak out or share any concerns with and member of staff.
- Our CMAT has robust safeguarding procedures to identify children at risk and all staff will follow safeguarding procedures in this policy to report a concern.
- Our schools will assess the risks of children being drawn into terrorism – (the DfE has published guidance on conducting Prevent risk assessments, as well as templates.[7])
- Where it is needed our schools will engage with their LA's risk assessment to determine the potential risk of individuals being drawn into terrorism in their local area.
- Our trust has measures in place to protect children from harmful online content, including appropriate filtering and monitoring systems.
- All staff receive training to help them identify children at risk, challenge extremist ideas, and know how to act when they have a concern.

OLOL CMAT and all academies will:

- Follow the protocol for external speakers (appendix 4).
- Political impartiality and not undermining FBV[8].
- Understanding and identifying risk within each setting.

All staff will look out for concerning changes in behaviour and report them to the designated safeguarding lead (DSL).

18.1 Educate against hate.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.
Staff will be alert to changes in children's behaviour. Educate Against Hate provides useful resources to identify indicators of possible radicalisation. https://www.educateagainsthate.com

18.2 Radicalisation.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
When you believe someone is in danger of being exploited or becoming radicalised, use your organisation's own safeguarding and duty of care procedures in the first instance to raise your concerns. Channel can then become involved when necessary.

Anyone can call the national police Prevent advice line on **0800 011 3764**[9], in confidence, to share your concerns with specially trained officers. The advice line is open 9am to 5pm every day (See the below link for guidance about when to call the police).[10]

You can also contact the Prevent team by emailing:

- Nottingham City prevent@nottinghamshire.pnn.police.uk, Prevent | Nottinghamshire Police
- Derbyshire Refer someone to the Prevent Team | Derbyshire Constabulary
- Nottinghamshire prevent@nottinghamshire.pnn.police.uk;
- Lincolnshire Refer someone to the Prevent Team | Lincolnshire Police (lincs.police.uk)
- North East Lincolnshire prevent@humberside.pnn.police.uk; Prevent-National-Referral-Form-NE-Lincs-22.12.20.docx (live.com)

[7] Prevent duty: risk assessment templates - GOV.UK (www.gov.uk)
[8] Political impartiality in schools - GOV.UK
[9] ACT Early | Prevent radicalisation
[10] CYP-schools-guide.pdf

- North Lincolnshire Prevent@humberside.pnn.police.uk; Prevent-National-Referral-Form-North-Lincolnshire-May-21.docx (live.com)

When you are concerned about someone outside your local area, for example, a student who doesn't live in your county, you can still call the number above for advice.

18.3 Extremism.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

18.4 Misinformation, Disinformation, and Conspiracy Content Online.

As part of our online safety and safeguarding curriculum, children are taught to recognise and critically assess misinformation, disinformation, and conspiracy content. In line with KCSIE, we are committed to building digital resilience, helping children question the reliability of online information, and understand how false or manipulated narratives can pose risks to their wellbeing, safety, or beliefs. This work supports our duties under the Prevent strategy and contributes to children's ability to navigate the digital world safely and responsibly. Schools recognise the increasing role of algorithms, targeted content and online influencers in exposing children to harmful narratives. Digital literacy education will support children to critically evaluate online content, identify manipulation and seek help when concerned.

18.5 Terrorism.

Terrorism is an action that: endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

The use or threat of terrorism is designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.
We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

18.6 Martyn's Law and Protective Security Procedures

In preparation for the Terrorism (Protection of Premises) Act 2025, commonly known as Martyn's Law, our schools maintain appropriate and proportionate protective security arrangements. The Act has received Royal Assent but its substantive requirements are not yet in force.

As part of our wider approach to site safety and emergency preparedness, the school has developed clear procedures for:

- Lockdown – securing the site to prevent or restrict the access of an intruder or attacker.
- Evacuation – safely removing individuals from the premises to an external place of safety.
- Invacuation – moving people into the building or to secure internal areas in response to an external threat.
- Communication – providing clear and timely alerts to staff, children, and visitors during an emergency.

These procedures are outlined in the school's Emergency Action Plan and are supported by staff training, visual guidance in key areas, and regular practice drills.

Our aim is to ensure that all individuals on site know how to respond swiftly and safely to any serious threat, and that we remain vigilant, prepared, and compliant with both statutory safeguarding duties and forthcoming legal requirements under Martyn's Law.

18.7 Additional support for online abuse.

CEOP works to keep children safe from sexual abuse and grooming online. **CEOP are unable to respond to reports about bullying, fake accounts or account hacking.**

It is important that when you are concerned that a child is being sexually abused or groomed online, (this might be from someone they know or someone they have only ever met online), you need to report your concern to our local statutory service, including children's social care and/or the police. CEOP are here to help and advise you and to make the child safe.

When you think a child is in immediate danger, please call the police on 999.
For more information relating to keeping children safe online from sexual exploitation and abuse you can visit our CEOP Education website for professionals.

19. Homestay / Host Families and Exchange Visits

In accordance with Part Three of KCSIE, where the school arranges for a visiting child to be provided with care and accommodation by a host family in the UK, the responsible adult(s) providing that care will be engaging in regulated activity for the period of the stay. The school will obtain an Enhanced DBS certificate with children's barred-list information for those adults. The school will use professional judgement to determine whether an Enhanced DBS certificate is also appropriate for any other person aged 16 or over living in the household.
For homestays abroad, the school will work with partner schools or organisations to establish and agree appropriate safeguarding arrangements and ensure parents are informed of those arrangements.

19.1 Linked policies:

This overarching safeguarding policy is supplemented with the following policies:

Keeping children safe in education 2026 (publishing.service.gov.uk)
Information sharing to safeguard children and young people – statutory guidance (DfE, 2026)

- **OLOL Central Policies**
  - OLOL Central Safeguarding and Child Protection Policy
  - OLOL Safer Recruitment Policy
  - OLOL Staff Code of Conduct
  - OLOL Managing Allegation Protocol
  - OLOL Low Level Concerns Protocol
  - OLOL Whistleblowing Policy
  - OLOL Attendance Policy
  - OLOL Restrictive Interventions Policy
  - OLOL DSL searching and confiscation Policy
  - OLOL Educational Visits Policy
  - OLOL Equality Policy Statement
  - OLOL Home visit policy and procedures
  - OLOL Intimate Care Policy
  - OLOL IT policy and Acceptable usage Policy
  - OLOL Lettings Policy
  - OLOL Modern Slavery Statement
  - OLOL Online Safety Policy
  - OLOL Restricting access to school site Policy
  - OLOL Safeguarding Statement
  - OLOL SEND Policy
  - OLOL Suspension and Exclusion Policy
  - OLOL Trust home school agreement
  - OLOL Drugs and substance misuse Policy

- OLOL Alternative Education Pathways

- **Local School Policies**
  - Prevent Policy and risk assessment, inclusive of filtering and monitoring.
  - Anti-bullying policy
  - Diocesan Relationships and Sex Education policy (and PSHE Curriculum overview)
  - Mental Health and Well-being Policy
  - Behaviour Policy

20. Information an Data Protection

From 30 September 2026, section 16LA of the Children Act 2004 places a statutory duty on relevant organisations, including designated education agencies, to share information for the purposes of safeguarding and promoting the welfare of children.

Where the Trust or a school holds information about a child, or another individual connected to a child, and considers that the information is relevant to safeguarding or promoting the welfare of that child, the information must be shared with another relevant organisation where it is considered that sharing may help that organisation to assess need or risk, make a decision, provide support or take safeguarding action.

The duty applies both where information is identified proactively and where relevant information is requested by another organisation covered by the duty. It is not dependent on a child meeting the threshold for significant harm or statutory intervention and therefore applies to emerging need, prevention and Family Help as well as child protection concerns.

Consent is not required where the statutory duty applies. Staff should be open and transparent with children and families about information sharing wherever it is safe and appropriate to do so, but should not seek consent where this would imply that information sharing can be prevented when there is a legal duty to share.

The duty does not apply where, using professional judgement, sharing the information would be more detrimental to the child than not sharing it. Such circumstances are expected to be rare. Decisions not to share information on this basis must be clearly recorded, together with the rationale.

Information shared must be relevant, necessary, proportionate, accurate and secure. A disclosure made in accordance with section 16LA does not breach an obligation of confidence.

Our Trust board and local governing bodies are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. We use the ICO guidance (https://ico.org.uk/for-organisations/employment/) [11] which includes information about our obligations and how we will comply, including protecting personal information, and providing access to official information.

In addition, Data protection in schools - Guidance - GOV.UK (www.gov.uk), helps school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and child's data to keep and follow good practices for preventing personal data breaches.

So that we:

- Comply with data protection law
- Develop data policies and processes
- Know what staff and child's data to keep

[11] This is currently draft guidance – policy will be updated when ICO finalises the new Code

- Follow good practices for preventing personal data breaches

Data protection legislation does not prevent appropriate safeguarding information sharing and, where the statutory Information Sharing Duty applies, relevant information **must** be shared.

20.1 Safeguarding resources available to OLOL schools:

- All staff, in each school, use CPOMs as the means of reporting and recording concerns about children. (See below under reporting and recording.)
- On behalf of its schools, the Trust subscribes to a range of services e.g. CPOMS, Flick safeguarding training and compliance.
- Governors use resources from Nottinghamshire Diocese and OLOL CMAT to support safeguarding monitoring visits to schools.
- Trust schools use Teams online portal for the SCR (Single Central Record) and to support our safer recruitment processes.
- Head teachers, DSLs and DDSLs use resources and updates provided in the 'OLOL Safeguarding' Teams channel.
- Schools maintain close links with their local safeguarding partnership and make use of learning events and resources.

21. Right Help: Right time – Local Levels of Need Threshold Guidance:

Nottinghamshire:	Pathway to Provision: Multi-Agency Thresholds Guidance for Nottinghamshire Children's Services
Nottingham City:	final-version-6-06-06-2023-nottingham-city-threshold-of-needs.pdf
Lincolnshire:	Lincolnshire County Council Safeguarding Children Policy
North Lincolnshire:	CMARS Early Help (northlincscmars.co.uk)
North East Lincolnshire:	https://www.nelincs.gov.uk/scp/
Derbyshire:	https://derbyshirescp.trixonline.co.uk/resources/documents-library

21.1 All staff will:

All staff will possess a working knowledge of the local levels of need thresholds guidance. Reference to this guidance will inform the identification of risk and harm.

All staff will follow the below guidance when working within an Early Years setting. This includes how mobile phones, cameras and other electronic devices with imaging and sharing capabilities are used in the setting (Pg 23, paragraph 3.6, Early years Foundation stage statutory framework).[12]

School Devices and phones, including electronic devices with imaging and sharing capabilities:

- In our school mobile phones or tablets, including electronic devices with imaging and sharing capabilities, must only be used by members of staff for work purposes.
- Our school's devices will not have any social media or messaging apps on them.
- The EYFS lead will ensure any apps downloaded onto EYFS devices are age and content appropriate for the children or staff using them.
- Passwords or passcodes for EYFS devices must not be shared or written down and will be changed regularly.
- Mobile phones and devices belonging to our school will always be used in accordance with the acceptable IT use policy and activity may be monitored for safeguarding reasons and to ensure policy compliance.
- During outings, staff will only use mobile phones belonging to our school wherever possible.
- Parental permission must be obtained on joining our school for the use of photographs or videos of children and consent should be sought every 12 months.

[12] EYFS statutory framework for group and school based providers (publishing.service.gov.uk)

- Any images or videos of children will be stored securely and deleted when no longer required.
- EYFS devices must not be taken home with staff and must remain secure at the setting when not in use.

Personal Devices and phones, including electronic devices with imaging and sharing capabilities:

- Personal mobile phones or tablets, including electronic devices with imaging and sharing capabilities, should be either turned off or on silent and not accessed during working hours.
- Mobile phones or tablets, including electronic devices with imaging and sharing capabilities, can only be used on a designated break and this must be away from the children.
- Mobile phones or tablets, including electronic devices with imaging and sharing capabilities, should be stored safely in staff lockers or another designated area at all times during working hours.
- During outings staff can only use mobile phones belonging to the EYFS unit.
- Photographs must not be taken of the children on any personal phones or any other personal information storage device. Only EYFS-owned devices can be used to take photographs or videos.
- Staff must not use personal mobile phones to communicate with parents/carers or give out their personal mobile numbers or email addresses.
- Staff who bring personal mobile phones or tablets, including electronic devices with imaging and sharing capabilities, into the provision must ensure that there is no inappropriate or illegal content on them.
- The early years setting is not responsible for the loss, damage or theft of any personal mobile device.

21.2 Outline Levels of Need categories.

- Universal (Level 1) No additional support beyond that which is universally available.
  Family Help (Level 2) Children and young people where some concerns are emerging and who require additional support, usually from professionals already involved with them (Threshold to Consider Family help/Early Help Assessment **EHA**).
- Targeted Family help (Level 3) Children and young people who are causing significant concern or where concerns recur frequently (Threshold to initiate **EHA**).
- Specialist) (Level 4) Children and young people who are very vulnerable. (Threshold to refer to Children's Social Care).

21.3 Early Intervention.

It is generally expected that referrals to children's social care would follow significant input at levels 2 and 3. The need for consent to access or engage with voluntary Family Help services should not be confused with the legal basis for sharing safeguarding information. Where the statutory Information Sharing Duty applies, relevant information must be shared even where a parent or child does not consent to the sharing. Families retain the choice whether to engage with voluntary support offered to them.

21.4 Family help Offer.

In line with Working Together to Safeguard Children (2026), schools will work collaboratively with safeguarding partners and wider agencies within a Family Help framework to provide coordinated support and early intervention for children and families.

Family help is defined as: 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.' Providing Family help is more effective in promoting the welfare of children than reacting later.

Effective Family Help depends on timely and proportionate information sharing between relevant agencies. Schools will proactively share relevant safeguarding and welfare information in accordance with the statutory Information Sharing Duty.

Family help can be particularly useful to address non-violent HSB (Harmful sexual behaviour) and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local Family help process is and how and where to access support.

Working together to safeguard children - GOV.UK (www.gov.uk)

The School's **Family help/Early Help Offer is** published online and sets out the range of services and assistance that school provides for children and families.

All Staff (Governors and Volunteers) working within the school are aware safeguarding is not just about protecting children from deliberate harm, neglect, and failure to act.

Family help is about providing the right help, at the right time, in the right place. Our belief is that children and young people are best supported by people they know and trust.

All children and young people may need extra help and support at some point in their lives. We are committed to continuing to identify and provide support to children and young people who are at risk of poor health and wellbeing.

Our school will identify who our vulnerable children are, ensuring all staff and volunteers know the processes to secure advice, help and support where needed in relation to child developmental needs or Family and environmental factors.

When a multi-agency response is required the TAC/ESCO process needs to be initiated to ensure all professionals are working together.

We refer to the Local Safeguarding Children's Partnership for guidance on Family help/Early Help and the TAC process.

22. Our personal role in the recognition of needs, harm, neglect, abuse or exploitation:

Staff will exercise professional curiosity when they notice unusual behaviour or possible indicators of harm. Children may not always be ready to disclose abuse, may not recognise their experiences as abuse, or may be fearful or ashamed. Staff should respectfully challenge information that appears inconsistent, incomplete or implausible and should not make assumptions or accept the first explanation without appropriate professional consideration. It is vital that our staff build trusted, respectful relationships that make children feel safe to share concerns. All staff are expected to maintain professional curiosity, recognise patterns of concern, and understand that abuse, neglect and exploitation may present through behaviour, attendance, emotional wellbeing, appearance, online activity or family circumstances.

Where staff suspect harm, they will not wait for a disclosure and will contact the DSL immediately.

22.1 Recognise.

It is important that everyone working with children should be able to recognise the signs of possible abuse, neglect or exploitation**.** It is not adequate to wait for disclosure as the primary means of detecting child abuse. The recognition and identification of signs of potential abuse will form part of our continuous professional development.

22.2 Respond.

All adults in school are 'Trusted Adults' and are emotionally available to children - a crucial aspect of our safeguarding culture. We will not ignore harmful behaviours or actions. We are prepared to respond appropriately to concerns and disclosures of abuse from children.

23. Staff training.

All staff members will receive input about safeguarding and child protection at induction. This will include:

- Current KCSIE guidance
- School Policies, including child behaviour
- The staff code of conduct
- Low Level Concerns policy/Managing Allegations Protocol
- Whistle-blowing procedures
- Online safety.
- Information sharing, including staff responsibilities under the statutory Information Sharing Duty.

This is to ensure that staff understand school's safeguarding systems, their responsibilities, and can identify signs of possible abuse, neglect or exploitation.

Professional learning will be continually updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff learning and curriculum planning.
- Be in line with advice from the Local Safeguarding Children Partnership.
- Have regard to the Teachers' Standards to support the expectation that all teachers: Manage behaviour effectively to ensure a good and safe environment; Have a clear understanding of the needs of all children.

Staff will receive regular safeguarding and child protection updates (through emails, e-bulletins and staff meetings) and enhanced by the termly Safeguarding CPD programme. Staff will receive annual safeguarding INSET and updates, each autumn term, prior to the return to school of children.

24. Roles and functions within our school:

24.1 Part 1 KCSIE.

All staff will read and understand Part One of Keeping Children Safe in Education (2026) through Flick online training and review this guidance at least annually

This policy is aligned with Keeping Children Safe in Education (KCSIE) 2026, which outlines specific safeguarding issues that all staff must be aware of. While these issues may not always present as standalone concerns, they often overlap and require a proactive, informed response. Staff receive training to recognise and respond to the following risks:

- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including county lines.
- Serious youth violence.
- Domestic abuse, including teenage relationship abuse.
- Mental health concerns linked to safeguarding.
- Radicalisation and extremism (Prevent Duty).
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and Forced Marriage.
- Children missing education (CME) or frequently absent.
- Online abuse and cybercrime, including the making, possessing and sharing of nudes and semi-nudes.
- Substance misuse, including parental drug or alcohol misuse.
- Private fostering arrangements.
- Homelessness and children in families facing complex challenges.

These and other emerging risks are addressed through training, policy implementation, and partnership with external agencies. Our staff maintain professional curiosity and act in the best interests of the child at all times, ensuring concerns are identified, escalated, and recorded promptly in line with statutory guidance.

24.2 Sign to acknowledge understanding of KCSIE.

At the start of each academic year, all staff will complete Flick online training and this confirms they have reviewed and understood the guidance.

24.3 All staff will be aware of.

The importance of seeing attendance, behaviour, mental health and safeguarding as closely linked

- The risks associated with persistent absence, emotional-based school avoidance and children missing education
- The importance of timely escalation where concerns persist or professional disagreement exists

- Our systems which support safeguarding, including:
    - This child protection and safeguarding policy,
    - the staff code of conduct the role and identity of the designated safeguarding lead (DSL) deputies,
    - the behaviour and online safety policies,
    - the safeguarding response to children who go missing from education.
- Children who are frequently or persistently absent from education, especially over prolonged periods, may be at risk of significant harm.
    - Staff will be alert to attendance patterns, unexplained absences, or repeat absences and report them to the DSL.
    - Absence tracking is embedded into the school's safeguarding systems and prompt referral to external agencies considered where appropriate.
- The Family Help process and their role in it, including the identification of emerging problems, liaison with the DSL, and their responsibility to share relevant safeguarding and welfare information with other professionals in accordance with the statutory Information Sharing Duty.
- Staff must understand that consent is not required where the statutory Information Sharing Duty applies, although children and families should normally be kept appropriately informed where it is safe to do so.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do when they identify a safeguarding issue or a child tells them they are being abused, neglected or exploited, including specific issues such as FGM and sexual abuse, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals. Especially understanding their statutory duty in reporting concerns to the police.
- The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as:
    - Child on child abuse.
    - Child sexual exploitation (CSE), Child criminal exploitation (CCE).
    - (which may involve an exchange for something the victim wants, and/or for the financial advantage or increased status of the perpetrator or facilitator).
    - indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

25. Contractors, agency staff and volunteers.

25.1 Contractors - **Refer to KCSIE.**

OLOL CMAT is committed to ensuring that all contractors and their employees who work on school premises do so in a manner that upholds our safeguarding responsibilities.

If there is an incident recorded on their DBS there would be a R.A completed before any decision is taken to allow the individual into school, this will be communicated to the headteacher prior to the contractor starting in school.

Contractors must submit details of their checks seven days before coming into school. These checks from central contractors are within the estate's portal. Please contact the estates team or your link DPS, if you have any concerns regarding contractors.

- All contractors must be subject to appropriate safeguarding checks based on the nature and frequency of their work and contact with children, in line with KCSIE.
- Contractors engaging in regulated activity relating to children must have an Enhanced DBS check with children's barred list information.
- Contractors who do not engage in regulated activity, but who have the opportunity for regular contact with children, will require an Enhanced DBS check without barred list information.
- Barred list checks will not be requested for individuals who are not engaging in regulated activity.
- Contractors for whom no DBS checks have been obtained will not be allowed to work unsupervised or engage in any activity that could bring them into unsupervised contact with children. In such cases, appropriate supervision arrangements will be implemented, depending on the level of risk and the nature of the work.
- All contractors will be required to report to reception and show photographic ID on arrival. They will be escorted or monitored in line with the school's visitor and safeguarding protocols.
- The school will maintain a record of the checks carried out on contractors as part of the Single Central Record (SCR), where required.

1. Supervision Arrangements (if no DBS check)
Where contractors are on site without a DBS check, they will always be supervised by a member of school staff who has undergone full DBS checks. The level of supervision will be risk-assessed and proportionate to the nature of the work being undertaken and the likelihood of contact with children.

2. Contractor Briefing on Safeguarding Expectations
All contractors working on-site will be provided with a safeguarding and conduct briefing or written information upon arrival, outlining expectations for professional behaviour, reporting concerns, and restricted areas within the school.

3. Contractor Access to children
Contractors are not permitted to have unsupervised access to children. They must not initiate contact with children and should immediately report any safeguarding concern or disclosure to a member of staff or the DSL.

4. Inclusion in the Single Central Record (SCR)
The school maintains a record of safeguarding checks for contractors in the Single Central Record where appropriate, in accordance with statutory requirements and DfE guidance.

5. Safeguarding Checks for Long-Term or Agency Contractors
Contractors who work in school regularly (e.g. catering, cleaning, IT support) and are likely to have frequent contact with children will be subject to the same safer recruitment checks as school employees, including relevant DBS checks and, where appropriate, child barred list checks.

Refer to Annex C, KCSIE.

25.2 Agency and third-party staff (supply staff).

Our school will obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as our school would otherwise perform on any individual who will be working at our school (or who will be providing education on our school's behalf, including through online delivery).

In respect of the Enhanced DBS check, our school will ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

Where the agency or organisation has obtained an Enhanced DBS certificate before the person is due to begin work at our school, which has disclosed any matter or information, or any information was provided to the employment business, we will obtain a copy of the certificate from the agency. It is an expectation that all supply staff will have been expected to read KCSIE part 1.

Our school will always check that the person presenting themselves for work is the same person on whom the checks have been made.

25.3 Volunteers.

Volunteers will receive appropriate CPD, if applicable.

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

OLOL CMAT will obtain an Enhanced DBS check (which should include children's barred list information) for all volunteers who are new to working in regulated activity with children in our school.

Where a school is subject to the EYFS framework, volunteers must not begin working within the settings covered by the EYFS framework until the school has received the volunteer's Enhanced DBS certificate including children's barred list information.

This policy should be read alongside Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026), local safeguarding partnership procedures and all Trust safeguarding protocols.

Appendix 1. Police and Criminal Evidence Act (1984) – Code C:

1. The Headteacher, Designated Safeguarding Lead (DSL) and deputy (DDSL) are aware of the requirement for
2. children to have an appropriate adult when in contact with Police officers.[13]
3. 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 these purposes.
4. 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.
5. If a police officer arrives at the school wishing to speak with a child, the receptionist will inform the principal and the DSL and follow the visitor's policy. The DSL will ensure that arrangements are made to inform parents that this is the case and seek their presence at the school as the appropriate adult. If for any reason the parent cannot attend to be an appropriate adult the DSL or Principal will ensure that an appropriate adult is provided from the school leadership team.
6. The DSL (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a child about an offence they may suspect. This communication will be recorded on our online safeguarding system.
7. If having been informed of the vulnerabilities, the DSL (or deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns immediately.
8. A person whom there are grounds to suspect of an offence must be cautioned[1] before questioned about an offence[2], or asked further questions if the answers they 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.
9. A Police Officer must not caution a child 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.
10. The appropriate adult' means, in the case of a child:

    - the parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
    - a social worker of a local authority or, 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.

[1] 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."*

[2] 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.

[13] when-to-call-the-police--guidance-for-schools-and-colleges.pdf

Appendix 2: How staff can report Low Level Concerns:

LOW-LEVEL CONCERNS:

Reporting your Low-Level Concerns

What is a low-level concern?

It is an allegation of behaviour by a staff member that:

- Does not meet the harm threshold and is not serious enough to consider a referral to the Local Authority Designated Officer (LADO).
- Does not pose an immediate risk to pupils.
- Causes unease, discomfort or nagging doubt.
- Is inconsistent with the staff code of conduct (even outside of work).

URL address:

https://tinyurl.com/4vur2e65

How to report your concern:

- **Use the QR code, web address or speak to your headteacher in person.**
- Make sure you use your work email address.
- Your concern will automatically be sent to your Headteacher.
- Your headteacher will acknowledge receipt of your concern.
- Alternatively, please refer your concern to the headteacher in person.

If in doubt, report it:

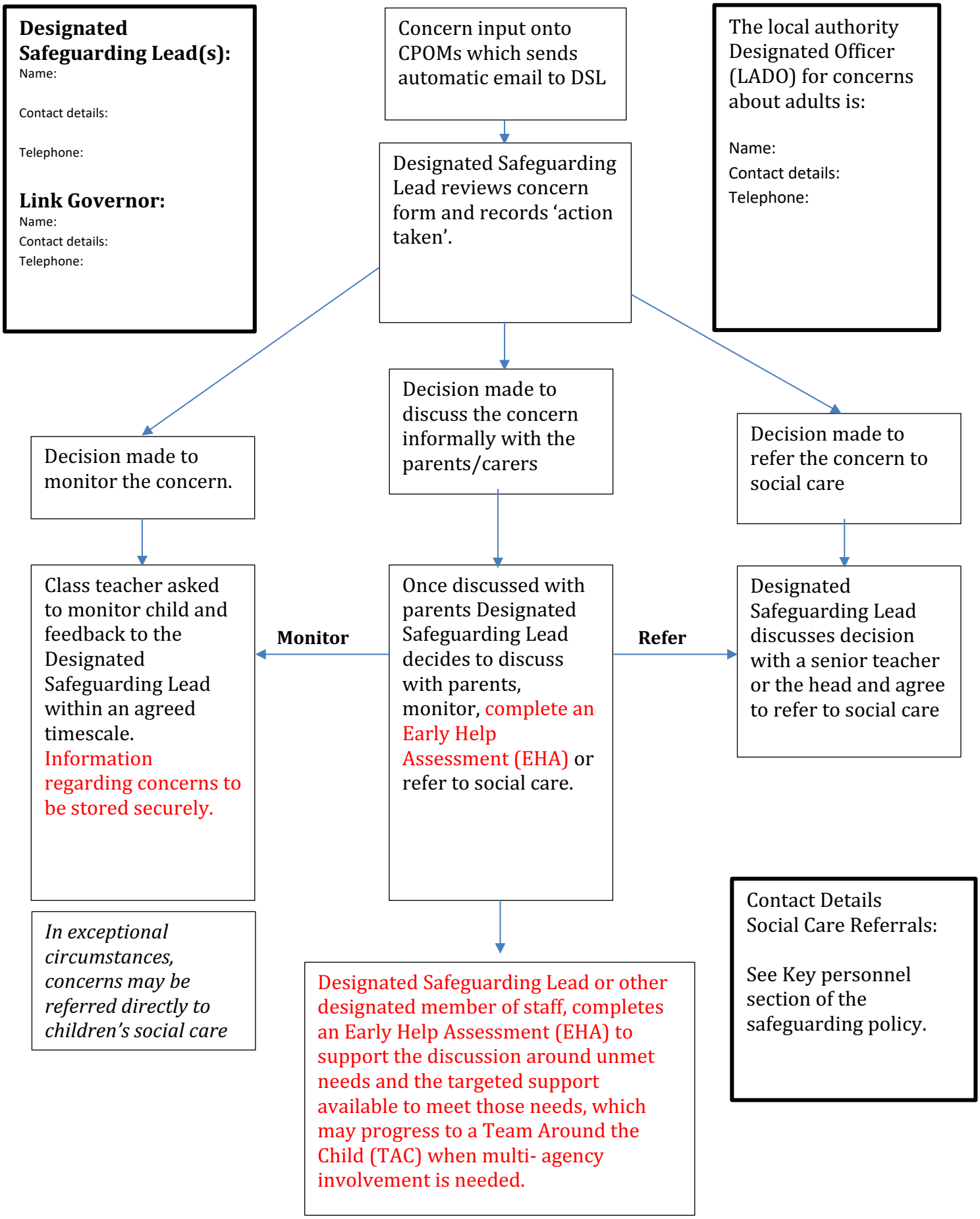
For concerns regarding your head, email:
j.mcgeachie@ololcatholicmat.co.uk

For concerns regarding staff:
you must report to your headteacher

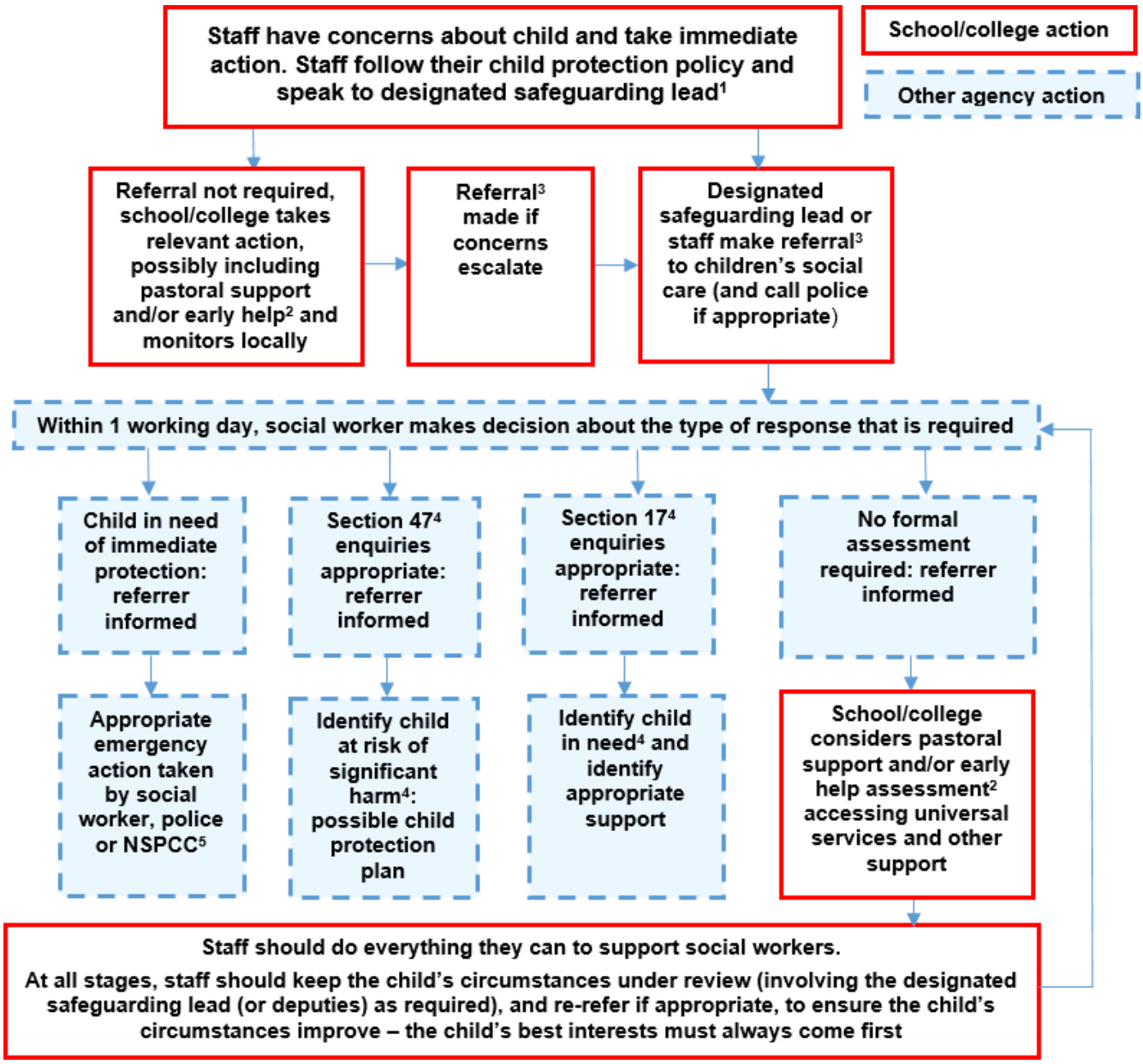
OUR LADY OF LOURDES
CATHOLIC MULTI-ACADEMY TRUST

Let's be safe **together**

Appendix 3: Flow chart for raising safeguarding concerns about a child:



3.1 Actions where there are concerns about a child:



Appendix 4: Protocol for external speakers or organisations at Trust and in schools.

In this protocol, our "CMAT" refers to Our Lady of Lourdes central team and all our academies.

Our CMAT potentially organises opportunities for children and staff to hear from external speakers. In some cases, it is possible that our CMAT could also let our premises to external organisations for community events. In both these cases, the organiser at Trust level (reporting to the DCEO) and Headteacher at school level (reporting to the DPS team) have a responsibility to ensure that the organisation is suitable.

As a Trust we will consider the following points before agreeing for an external organisation to use our premises or hold an event for our central team or for our academies:

- The topic and purpose of the event
- Whether it would appropriate for students (and the likelihood of students attending the event if held outside normal school hours)
- The reputation of the organisers and any speakers – we will check the organisers and any speakers' status and history by searching the internet, including social media.
- Who might attend?
- Any risks to our schools and CMAT reputation and ethos
- The potential or likelihood that the visit will stir up hatred or incite violence.
- The views of the community safety team, local police or local Prevent coordinator if you have any concerns.

Through hosting external speakers, our CMAT will provide a safe space for students to engage with a variety of issues and hear and debate different perspectives. Our CMAT has a responsibility to ensure that the people they invite to speak are suitable and that all safeguarding procedures are followed.

When inviting speakers, the central team and schools are reminded of the following:

- Keeping children safe in education is statutory guidance that our CMAT must have regard to when carrying out our duties to safeguard and promote the welfare of children. When inviting speakers, our CMAT will be conscious of the safeguarding requirements in the guidance.
- The statutory guidance on the Prevent Duty[14] makes clear that as part of our safeguarding policies, our CMAT should 'set out clear protocols for ensuring that any visiting speakers whether invited by staff or children themselves are suitable and appropriately supervised'.
- Our CMAT is subject to requirements to ***forbid political indoctrination*** and secure a balanced treatment of political issues. This extends to extra-curricular activities which are provided or organised for registered children at the school by or on behalf of the school.[15]
- Teaching misconduct guidance[16] states that staff are 'likely to face prohibition if they deliberately allow exposure of children to such actions that undermine fundamental British values including promoting political or religious extremism by inviting individuals to speak in schools.

Our schools play an important role within the community and will often let their premises to external organisations. This can also be a means of generating additional income for the benefit of the school. The above principles apply in relation both to speakers visiting during normal school hours and to organisations and individuals using the premises outside school hours.

[14] Prevent duty guidance: Guidance for specified authorities in England and Wales (publishing.service.gov.uk)
[15] Section 406 and 407 of the Education Act 1996 and standard 5c of the Independent School Standards
[16] Teacher misconduct - GOV.UK (www.gov.uk)

Our schools will only let their premises to organisations and individuals whose conduct is in accordance with the ethos of the school. Similar considerations will apply to hosting speakers outside of school hours as during school hours if students are likely to attend these events.

Our CMAT will ensure, in making any decisions about whether to host an external speaker, that they comply with the public sector equality duty and that they are not discriminating by reference to protected characteristics.

The equalities guidance for schools contains advice on ensuring that the public sector equalities duty is fulfilled (see chapter 5)[17]

Useful links:

- Keeping children safe in education
- Protecting children from radicalisation: the Prevent duty
- Inspecting safeguarding in early years, education and skills settings
- Hosting Speakers on School Premises Guidance

[17] Equality and diversity - Department for Education - GOV.UK (www.gov.uk)

Appendix 5: Staffing Ratios and requirements for EYFS settings in schools.

Requirements for the whole setting (EYFS setting includes Reception and or Nursery)

In all Early Years Foundation Stage (EYFS) settings:

- EYFS Leads:
  - Appointed on or after 1 January 2025: must hold a suitable level 2 qualification in maths or must do so within 2 years of starting the position.
  - Must hold at least a full and relevant level 3 qualification.
  - Should have at least 2 years of experience of working in an early years setting, or have at least 2 years of other suitable experience
- At least half of all other staff must hold at least an approved level 2 qualification
- At least 1 person who has a current paediatric first aid (PFA) certificate must be on the premises and available at all times when children are present, and must accompany children on outings.

Age of children	**Number of staff**	**Qualification requirement**
Children under 2 years old	At least 1 member of staff for every 3 children.	• At least 1 member of staff must have an approved level 3 qualification, and have suitable experience of working with children under 2. • At least half of all staff must have an approved level 2 qualification. • At least half of all staff must have received training that specifically addresses the care of babies. • If there's a room for under 2-year-olds, the member of staff in charge of the room must, in the judgement of the provider, have suitable experience of working with children in this age group.
Children aged 2	At least 1 member of staff for every 5 children.	• At least 1 member of staff must have an approved level 3 qualification • At least half of all staff must have an approved level 2 qualification
Children aged 3 and over	Where a person with qualified teacher status (QTS), early years professional status (EYPS), early years teacher status (EYTS) or another suitable level 6 qualification; an instructor; or a suitably qualified overseas trained teacher is working directly with the children: • If most children will reach the age of 5 or older within the school year, there must be at least 1 member of staff for every 30 children. • If not, there must be at least 1 member of staff for every 13 children.	• At least 1 other member of staff must have an approved level 3 qualification

	Where there is no person with the qualifications listed in the row above working directly with the children: • There must be at least 1 member of staff for every 8 children	• At least 1 member of staff must have a full and relevant level 3 qualification. • If other members of staff are needed to fulfil the ratio, at least half of them must have a full and relevant level 2 qualification.
Children in reception classes	At least 1 schoolteacher for every 30 children (not counting any excepted children.)	• No other requirements specified

Who counts as a 'staff member'?

To count as a member of staff in respect to these ratios, individuals must:

- **At level 2 or 3 in an early years setting:** if they've achieved a level 2 or 3 qualification since 30 June 2016, have a full PFA or emergency PFA certificate within 3 months of starting work. This must be renewed every 3 years.
- **At level 3:** if they hold an early year's educator qualification, also have a suitable level 2 qualification in English.

The following can be included in the ratios at the level below their level of study if you're satisfied they're 'competent and responsible':

- Suitable students on long-term placements
- Volunteers (aged 17 or over)
- Staff working as apprentices in early education (aged 16 or over).

The staffing and qualification requirements span pages 28–33 of the EYFS framework.[18]

What counts as 'adequate supervision?'

- For adequate supervision, children must usually be within sight **and** hearing of staff, and **always** within sight **or** hearing.
- While eating, children **must** be within both sight **and** hearing of a staff member.

Additional Information:

Reception classes with mixed ages:

- If you have children younger than reception age:
  - Staffing ratios must be calculated and applied separately, to make sure the needs of each age range are met (e.g. if you have 15 reception-aged children and 4 children aged 2, you'll need at least 2 members of staff to satisfy the 1:30 and 1:5 ratios for the respective age groups)
  - However, qualification requirements can be met across all the staff working in the class (e.g. if you need staff members with level 3 qualifications to fulfil requirements for 2 different age ranges, then a single staff member with the right qualification can be used, rather than finding 2)
- If you have children older than reception age: the reception class staffing ratio would apply (e.g. if you have a class made up of children in reception, year 1 and year 2, they'd all be included in the 1:30 ratio)

[18] Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)

Appendix 6: Prevent Risk Assessment.

The prevent risk assessments can be found by accessing the below link.

Prevent_risk__assessment_for_schools.ods

Before you begin to complete the Risk Assessment consider:

- What awareness leaders and managers have of national, regional and local risks
- What training staff have received to give them an awareness and understanding of radicalisation risk
- What actions leaders, managers and staff need take to protect children from these risk
- How effectively providers collaborate with local partners including the local authority, Prevent leads, the police and community safety partnerships, and DfE regional Prevent co-ordinator
- How aware children are of local risks and how to protect themselves
- What is being done to build resilience to radicalisation, including protecting children online and raising awareness of online safety
- The actions you have taken to protect children from radicalisation proportionate to the risk posed in your area, cohort of children and size of institution
- What options may be available and appropriate to take in response to local risks

Develop an awareness of the UK's current terrorism threat picture, including:

- The UK's current threat and risk picture that is impacting children
- The age, gender and type of concern of those referred to Prevent and those arrested for terrorism offences
- How individuals are exposed to harmful extremist content online; share extremist or illegal content which may present a risk to themselves and others; and engage with extremists online, on social media or chat forums, or through gaming
- Different ideological narratives, for example, Islamist and extreme right-wing – Educate Against Hate provides further information
- Different terrorist groups or organisations banned under UK law

Online training for Prevent awareness

Online courses on Prevent awareness include:

- Prevent awareness elearning - an introduction to the Prevent duty (Home Office)
- Prevent referrals elearning - make a referral that is robust, informed and with good intention (Home Office)
- Channel awareness elearning - understand the objectives of the Channel programme, the working process, roles and responsibilities (Home Office)
- Prevent for further education and training - aimed at different audiences including staff, governors and board members (Education and Training Foundation)

Resources for teachers and school leaders

You can get more guidance, resources and practical advice from:

- Educate Against Hate
- ETF Learners from the Education and Learning Foundation
- ACT - Action Counters Terrorism
- Notice, check, share procedure