

# **Safeguarding and Child Protection Policy 25-26**

**August 2025**

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## CONTENTS

1. Introduction.....	3
2. Scope .....	3
3. Legal and Statutory Framework .....	3
4. Roles and Responsibilities .....	4
5. Safeguarding Principles .....	6
6. Safeguarding Standards for Academies .....	7
7. Safeguarding Audits and Quality Assurance .....	9
8. Safer Recruitment .....	9
9. Managing Allegations and Concerns .....	10
Appendix 1.....	12

## 1. INTRODUCTION

- 1.1 This policy provides the overarching ethos for safeguarding and child protection within all schools of Romero Catholic Academy Trust. It provides the standard that must be adhered to by all staff.
- 1.2 The Trust promotes a shared approach to safeguarding and child protection that is universal across all schools and must be written in the respective Safeguarding and Child Protection Policy for each school.
- 1.3 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone that comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals must ensure their approach is child centred. This means they should consider, at all times, what is in the best interests of the child.
- 1.4 All schools must have their own Safeguarding and Child Protection Policy that meets local arrangements, and which is specific to each school. However, each policy must respect and adhere to this guidance.
- 1.5 This policy should be read taking consideration of the following trust and or school policies and key legislation and guidance.
  - Guidance for Safe Working Practice (Code of Conduct)
  - Allegation Policy
  - Low-level concerns Policy
  - Whistleblowing Policy
  - Data Protection Guidance (GDPR)
  - Relationships and Health Education (Primary); Relationships and Sex Education (Secondary)
  - Safer Recruitment
  - Health and Safety
  - Safeguarding Child Protection Policy and Procedures
  - Keeping Children Safe in Education 2025
  - Working together to safeguard children 2023

## 2. SCOPE

- 2.1 All staff working with our children and young people, whether or not employed by Romero Trust are expected to comply with this ethos and to have regard to the Safeguarding and Child Protection policy and procedures, within each school. This includes all directors, governors, employees, including casual and agency staff, self-employed or contractual workers and volunteers.
- 2.2 This policy applies fairly to all employees irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

## 3. LEGAL AND STATUTORY FRAMEWORK

- 3.1 This policy is fully compliant with all relevant statutory and legislative safeguarding guidance. It aligns with **Keeping Children Safe in Education (KCSIE) 2025** by establishing clear expectations for safer recruitment, the role and training of Designated Safeguarding Leads (DSLs), staff responsibilities, managing concerns and allegations, online safety, and child-on-child abuse. It incorporates the principles of **Working Together to Safeguard Children (WTSC) 2023** by promoting effective multi-agency working, the importance of early help, and clear referral pathways to children's social care where there are concerns about significant harm. In line with the **Children Acts 1989 and 2004**, this policy prioritises the welfare of the child and sets out procedures to protect children in need and those at risk of harm. Compliance with the **Education Act 2002** is demonstrated through the Trust's commitment to safeguarding as a core function of educational provision, ensuring that children are safe, supported, and able to learn in a secure environment.

- 3.2 The policy also reflects the Trust's duty under the **Prevent Duty (Counter-Terrorism and Security Act 2015)** to protect children from the risk of radicalisation, through staff training, risk assessments, and clear referral mechanisms to Channel panels where required. The handling of concerns relating to inappropriate sexual behaviour is guided by the **Sexual Violence and Sexual Harassment in Schools Guidance**, ensuring there are clear systems in place for reporting, responding to, and supporting all pupils involved. Finally, the policy ensures compliance with the **Data Protection Act 2018 and UK GDPR**, balancing the need to share

## 4. ROLES AND RESPONSIBILITIES

### Trust board of directors

- 4.1 The Board of Directors hold ultimate accountability for safeguarding across all academies within Romero Catholic Academy Trust.
- 4.2 The Trust has a responsibility to ensure that the arrangements for safeguarding within each school under the responsibility of each Headteacher are secure and robust and that any shortfall is rectified. Directors need to have an awareness and understanding of all of the policies that underpin Safeguarding.
- 4.3 The Trust will ensure that arrangements must be shared across any additional leadership and support that is provided in circumstances of need to a setting. This may include, cover arrangements for when the Designated Safeguarding Lead or Deputies may not be available in school, and clarity over Whistleblowing and Allegations of Abuse Against a Member of Staff or Volunteer policies and procedures.
- 4.4 In addition, Directors, through the executive team, are responsible for ensuring that legislation and guidance is adhered to by the Headteacher and senior leaders within a school and that all of the necessary safeguarding policies and procedures are in place within the setting.
- 4.5 Failure to comply with Trust policy in respect of safeguarding may result in disciplinary action. Directors also have responsibility for ensuring that Headteachers and senior leaders are held to account for all aspects of safeguarding and most importantly that all legislation, guidance and policies work effectively in practice by the whole workforce.

### Named safeguarding trustee

- 4.6 The named Director meets with the Head of Safeguarding termly to understand trends across phases, localities and national trends and to monitor the Safeguarding Delivery Offer and Strategy.
- 4.7 The named Director is aware of the focus from local Safeguarding Partnerships and national issues. The named Director is aware of any focus from Ofsted in relation to Safeguarding and is assured that the Head of Safeguarding is informed and taking appropriate action
- 4.8 The named Director is aware of any Safeguarding risks within Romero Catholic Academy Trust and seeks assurances that leadership teams across the Trust, including the Central Executive Team, are taking appropriate action to minimise future risks.

### Trust safeguarding lead

- 4.9 The Romero Catholic Academy Trust Safeguarding Lead provides strategic direction and expert advice on all safeguarding and child protection matters across the Trust. They act as a central point of contact for Designated Safeguarding Leads (DSLs) within each academy, offering guidance, professional supervision, and support to ensure consistent and effective safeguarding practice.

- 4.10 The Trust Safeguarding Lead is also responsible for reviewing the implementation of safeguarding policies and the delivery of staff training across the Trust, ensuring alignment with statutory requirements and best practice. Their work supports a culture of vigilance, accountability, and continuous improvement in safeguarding across all academies

### **Local governing bodies**

- 4.11 Local Governing Bodies (LGBs) play a vital role in ensuring effective safeguarding within their individual academies. They are responsible for monitoring the implementation of safeguarding policies and practices at the school level, ensuring that statutory duties are met and that the welfare of all pupils remains a top priority.
- 4.12 Each LGB must appoint a designated Local Safeguarding Governor to provide focused oversight, challenge, and support to the school's safeguarding team, including the Designated Safeguarding Lead (DSL).
- 4.13 The Local Safeguarding Governor regularly reviews safeguarding arrangements, participates in relevant training, and reports back to the full governing body to ensure continued accountability and improvement.
- 4.14 Local Governing Bodies, supported by the executive team, are responsible for overseeing and ensuring that all the appropriate and necessary health and safety checks are in place to ensure both staff and young people are safe and secure both on and off site. They may also be part of the quality assurance audits in many of these areas.
- 4.15 Local Governing Bodies, supported by the executive team, are responsible for the content of the PHSE (Personal, Health, Social, Economic), SMSC (Spiritual, Moral, Social and Cultural) and RHSE (Relationships Health & Sex Education) curriculum and must ensure that it meets the needs of all young people.
- 4.16 The Competency Framework for Governance states that everyone on the Board should understand the duties relating to safeguarding, including the Prevent Duty. All governors will read part 2 of KCSIE

### **Designated safeguarding lead**

- 4.17 All schools must appoint a member of staff from the senior leadership team to the role of Designated Safeguarding Lead (DSL). Where there are Deputy DSL's, these people should be trained to the same standard as the DSL and the role should be detailed on their job description.
- 4.18 The DSL must have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, or support other staff to do so, and contribute to the assessment of children and young people.
- 4.19 The DSL (and any deputies) must undergo training to provide them with the knowledge and skills required to carry out the role. This training must be taken fully every 2 years and updated annually. Prevent awareness training must also be undertaken.
- 4.20 The DSL must liaise with the local authority and work with other agencies in accordance with Working Together to Safeguard Children (2023) and Keeping Children Safe in Education 2025.
- 4.21 The expectation of all staff is that any concerns relating to significant harm are reported immediately to the DSL. In exceptional circumstances, if the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

- 4.22 If the concern relates to the Headteacher who is the DSL, Romero Catholic Academy Trust's CEO\* (\*or officer nominated by the CEO) and Head of safeguarding should be informed, who will also notify the Chair of Governors for information.
- 4.23 During term time the DSL (or a deputy) should be available during school hours, for staff to discuss any safeguarding concerns. The DSL must ensure adequate and appropriate cover arrangements for any out of hours or out-of-term activities.
- 4.24 The DSL must ensure that all staff are inducted into the school's safeguarding and child protection procedures, ideally in 2 weeks of starting work in the school.
- 4.25 DSL's will In the DSL's safeguarding report to Governors, a statement should be made that refers to the training opportunities and the effectiveness of the training.
- 4.26 The DSL should ensure there is regular supervision of case files.

#### All staff

- 4.27 All staff across Romero Catholic Academy Trust have a shared responsibility to safeguard and promote the welfare of children. Regardless of role or seniority, all staff must complete appropriate safeguarding training relevant to their position and remain up to date with current procedures and expectations.
- 4.28 Every member of staff is expected to take personal responsibility for reporting any safeguarding concerns immediately, in line with the Trust's reporting procedures.
- 4.29 Staff must read and understand Part One of Keeping Children Safe in Education (2025) and refer to it regularly to guide their practice. In addition, staff must take steps to minimise their own vulnerability, avoiding being alone with pupils where possible and maintaining professional boundaries at all times.
- 4.30 Above all, staff should remain vigilant to the needs of young people and alert to any signs that may indicate a child is at risk of harm or abuse.

## 5. SAFEGUARDING PRINCIPLES

- 5.1 At the heart of our approach to safeguarding is a firm commitment to being **child-centred**, ensuring that the needs, rights, and welfare of every child are prioritised in all decisions, actions, and policies. We strive to listen to the voice of the child, understand their lived experience, and act in their best interests at all times.
- 5.2 Our approach is also **preventative**, recognising that early identification of concerns and timely intervention can significantly reduce risks and improve outcomes. All academies within Romero Catholic Academy Trust provide access to early help services, work closely with external agencies, and promote a culture where children feel safe to speak up.
- 5.3 All staff should be aware of their local early help process and understand their role in it. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, that may follow a referral, along with the role they might be expected to play in such assessments. All staff should know what to do if a child tells them they are being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.
- 5.4 We take a **proactive** stance on safeguarding by ensuring that all staff receive regular, high-quality training and updates, equipping them with the knowledge and confidence to identify risks and respond appropriately. Safeguarding is a collective responsibility, and we foster an environment of vigilance across all Trust schools.

- 5.5 All staff must read 'Keeping Children Safe in Education 2025 and reflect on it to demonstrate the move from compliance to impact.
- 5.6 The DSL must keep an updated training tracker for staff having received training, when and of which type, such as basic, advanced, safer recruitment
- 5.7 All staff must receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff must receive safeguarding and child protection updates (for example, via emails, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- 5.8 A **protective** framework is also in place, which includes robust safeguarding procedures, clear reporting pathways, a strong safeguarding culture, and physically and emotionally safe environments for children to thrive. We regularly review our policies, premises, and practices to ensure they reflect best practice and statutory guidance.
- 5.9 The expectation of all staff is that any concerns relating to significant harm are reported immediately to the DSL. (see Appendix 1 for flowchart) In exceptional circumstances, if the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.
- 5.10 In terms of physical site safety, schools are encouraged to aim for one single point of entry (and exit) and any additional entry/exit points must be supervised by adults. Traffic and road safety of pupils is paramount and pupils and vehicles must be separated, recognising that the start and end of the school day is most risky to children. The school perimeters should have appropriate fencing and buffer zones that must be kept in good order.
- 5.11 Use of CCTV cameras must be used in accordance with General Data Protection Regulations to satisfy prevention of misuse or challenge.
- 5.12 All visitors must be identified and recorded. Visitors that do not have DBS clearance must be supervised at all times.
- 5.13 All staff are accountable for ensuring that wherever young people are, they are safe. This means that they are responsible for not only ensuring that classroom and working areas are safe but also that shared areas e.g. hall, outdoor area, reception area are safe and must responsibly report any issues or concerns.
- 5.14 Finally, our safeguarding approach is **partnership-driven**, built on strong, collaborative relationships with families, local authorities, social care, and other safeguarding partners. We recognise that safeguarding is most effective when information is shared appropriately and when agencies work together to protect and support children and young people. Through open communication and mutual accountability, we aim to build a coordinated and compassionate safeguarding network around every child.
- 5.15 We recognise the impact of wider environmental factors in a child's life that may be a threat to their welfare and/or safety (extra-familial harms) and aim to be outward facing so that we can effectively assess the risks and issues in the wider community when considering the well-being and safety of our pupils. To do this our Head of Safeguarding will engage with Safeguarding partnership boards and keep up to date with national agendas.

## 6. SAFEGUARDING STANDARDS FOR ACADEMIES

- 6.1 Each academy within Romero Catholic Academy Trust must ensure that its safeguarding policy



includes clear, detailed procedures covering all core safeguarding areas, in line with statutory guidance and local safeguarding partnership arrangements.

- 6.2 Procedures for **child protection** must set out how concerns about a child's safety or welfare are identified, recorded, and referred promptly to the Designated Safeguarding Lead (DSL) or their deputy. All staff must be trained to recognise signs of abuse, neglect, and exploitation, and to act without delay. The welfare of the child is always the first priority, and any suspicion of harm must be addressed immediately.
- 6.3 Recognising that harm can occur between children, each academy must have robust arrangements to prevent and respond to **peer-on-peer abuse**. This includes tackling bullying, sexual harassment, sexual violence, and harmful online behaviours. All incidents must be taken seriously, investigated thoroughly, and recorded in line with safeguarding procedures, with appropriate support provided to both victims and those responsible for the harm.
- 6.4 Given the growing risks posed by digital technologies, academies must have effective **online safety** measures in place. This includes delivering a comprehensive online safety curriculum, maintaining secure filtering and monitoring systems, and ensuring staff, pupils, and parents are equipped to use technology safely. Clear reporting mechanisms must exist for any online incidents or concerns.
- 6.5 Safeguarding also includes supporting **mental health and wellbeing**, recognising the strong link between emotional welfare and a child's ability to stay safe. Staff must be trained to notice early signs of mental health difficulties and know how to offer support and refer to specialist services when needed. A strong pastoral culture and preventative wellbeing initiatives must be embedded across each academy.
- 6.6 Recruitment processes must adhere to **safer recruitment** principles to ensure that only suitable individuals work with children. This includes rigorous pre-employment checks, such as references, identity verification, and enhanced Disclosure and Barring Service (DBS) checks. Safeguarding must be a core consideration in all appointment decisions, and interviews must address the candidate's commitment to child protection.
- 6.7 A transparent and accessible **whistleblowing** procedure must be in place in every academy, enabling staff, volunteers, and others to raise concerns about unsafe or unethical practices without fear of retaliation. All concerns will be treated seriously, investigated appropriately, and handled in a confidential manner where possible.
- 6.8 In line with the Prevent Duty, academies must take proactive steps to **prevent radicalisation** and protect pupils from extremism. This includes staff training to recognise warning signs, providing a curriculum that fosters critical thinking and mutual respect, and working with relevant agencies where there are concerns.
- 6.9 Children with **special educational needs and disabilities (SEND)**, as well as those with other vulnerabilities, may face additional safeguarding risks. Procedures must ensure that these children receive appropriate protection, with staff trained to adapt approaches to their needs and to identify possible signs of abuse in those who may find it difficult to communicate their experiences.
- 6.10 Finally, every academy must have clear procedures for managing **allegations against staff**, contractors, and volunteers. All allegations must be reported immediately to the headteacher or principal, who will liaise with the Local Authority Designated Officer (LADO) as required. Investigations must safeguard the welfare of the child while ensuring fair and proportionate treatment for the individual involved.
- 6.11 Together, these procedures form the foundation of a consistent, trust-wide safeguarding approach, ensuring that all children in our care are protected, supported, and empowered to thrive in a safe environment.



## 7. SAFEGUARDING AUDITS AND QUALITY ASSURANCE

- 7.1 Romero Catholic Academy Trust is committed to ensuring that safeguarding arrangements are robust, consistent, and continually improving across all academies. To achieve this, a comprehensive programme of monitoring and review is in place. An **annual Trust-wide safeguarding audit** will be undertaken to assess compliance with statutory requirements, identify areas of good practice, and highlight any gaps or risks. Findings from the audit will inform action plans and staff training priorities for the following year.
- 7.2 **Termly Designated Safeguarding Lead (DSL) network meetings** will be held to share updates on legislation, guidance, and best practice. These meetings also provide a forum for professional supervision, discussion of safeguarding trends, and the development of consistent procedures across all academies. **Peer reviews between academies** will be facilitated periodically, allowing schools to learn from one another, challenge practice constructively, and strengthen the overall safeguarding culture within the Trust.
- 7.3 Safeguarding performance is also subject to regular **reporting to the Trust Board**, ensuring transparency and accountability at the highest level. In line with statutory requirements, the **Safeguarding Report to Directors and Local Governors** is a duty arising from Section 157 of the Education Act 2002 and applies to academies. This report, undertaken annually, enables governors to monitor each academy's compliance, identify issues, and plan for improvements.
- 7.4 In addition, the safeguarding report must provide information to the Local Authority to enable it to meet its statutory duty under Section 14B of the Children Act 2004. This duty requires schools and colleges to supply safeguarding information to the Children's Safeguarding Assurance Partnership (CSAP) for their local area, in accordance with Section 11 of the Children Act 2004, to support the performance of its functions and to monitor the compliance of all schools in safeguarding children and young people, regardless of school status.
- 7.5 Each Headteacher is responsible for reporting to their own governing body in line with these statutory duties and for providing the Trust's Head of safeguarding with the necessary information to compile a Trust-wide safeguarding summary. This summary will be presented to Romero Catholic Academy Trust Board to ensure a comprehensive overview of safeguarding across all academies.

## 8. SAFER RECRUITMENT

- 8.1 Romero Catholic Academy Trust recognises the importance of creating and sustaining a culture that safeguards and promotes the welfare of children. As part of this culture, we maintain robust recruitment and selection procedures designed to deter, identify, and prevent individuals who are unsuitable to work with children from securing employment or volunteering opportunities within the Trust.

### Recruitment Principles

- 8.2 Shortlisting of candidates will be undertaken against the criteria set out in the relevant Job Description and Person Specification. Employment opportunities with the Trust are exempt from the Rehabilitation of Offenders Act 1974. Shortlisted candidates will be required to declare any relevant convictions, adult cautions, or other matters which may affect their suitability to work with children. In line with amendments to the Rehabilitation of Offenders Act 1974 (Exceptions Order 1975) made in 2013 and 2020, some offences are now protected (filtered) and must not be disclosed; employers cannot take such offences into account.

### References and Pre-Interview Checks

- 8.3 Where possible, references will be obtained prior to interview, with any concerns raised explored with the referee and discussed further with the candidate at interview. The Trust will always seek a minimum of two references for each candidate. As part of due diligence, reasonable online searches will be carried out for shortlisted candidates to identify any publicly available information that may

impact their suitability. These searches will be conducted by an HR Officer who is independent from the recruitment panel. Any concerns will be shared with the panel for consideration. Where significant safeguarding concerns arise that indicate unsuitability to work with children or within the organisation, the recruitment process will be terminated, and relevant safeguarding referrals considered in line with the Trust's Allegations and Concerns Policy.

### **Selection Process**

- 8.4 The Trust will use a range of selection techniques to assess candidates and determine the most suitable person for the post. At least one member of every interview panel will have completed statutory Safer Recruitment Training. The recruitment panel may use interview questioning to explore safeguarding values, attitudes, and the candidate's suitability to work with children.

### **Conditional Offers and Pre-Employment Checks**

- 8.5 All offers of appointment will be conditional upon the satisfactory completion of all mandatory pre-employment checks, as outlined in Keeping Children Safe in Education (2025) and relevant regulations. This includes an enhanced Disclosure and Barring Service (DBS) check (with barred list information where applicable) and any other statutory checks required for the role. The Trust maintains a record of all pre-appointment checks in each academy, referred to as the Single Central Record (SCR), which also includes members and trustees. The Trust will ensure that there is an updated Trust-wide SCR, while each school will maintain and review its own SCR at least every half term.

### **Staff Conduct and Responsibilities**

- 8.6 All staff, regardless of role, have a responsibility to ensure that both their own conduct and that of others is safe. Any behaviour that places a young person at risk must be reported immediately to the Headteacher, or to the CEO if the concern relates to the Headteacher, via the Whistleblowing Policy. Expectations regarding professional conduct will be communicated during the recruitment process, reinforced through a thorough induction prior to commencement of duties, and re-visited when staff return from long-term absence.

### **Induction and Ongoing Compliance**

- 8.7 All staff must read and understand the Staff Code of Conduct, the Safeguarding and Child Protection Policy, and the Behaviour Policy at the start of each academic year, in addition to statutory safeguarding guidance. The Trust will ensure that safeguarding and safer working practice expectations are embedded into everyday operations, contributing to a culture of transparency, accountability, and vigilance.

## **9. MANAGING ALLEGATIONS AND CONCERNS**

- 9.1 Romero Catholic Academy Trust is committed to ensuring that all safeguarding concerns and allegations about adults working with children are managed in a prompt, fair, and consistent manner, in line with Keeping Children Safe in Education (KCSIE) 2025. This includes allegations that meet the harm threshold and those that are considered low-level concerns.

### **Allegations That Meet the Harm Threshold**

- 9.2 An allegation will be considered as meeting the harm threshold where it is alleged that a member of staff, supply staff, contractor, or volunteer has:
- (a) behaved in a way that has harmed a child or may have harmed a child; and/or
  - (b) possibly committed a criminal offence against, or related to, a child; and/or
  - (c) behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
  - (d) behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- 9.3 Where such an allegation arises, the Headteacher will act as the Investigating Officer and will ensure that the Local Authority Designated Officer (LADO) is informed immediately. Decisions regarding progression, including whether disciplinary proceedings should follow, will be made in consultation with the LADO in accordance with statutory guidance.
- 9.4 If disciplinary proceedings take place, a member of the Governing Body will serve on the Hearing Panel, in line with the Trust's Allegations Policy and Part 4 of KCSIE. Allegations relating to the headteacher will be managed by the chair of governors in partnership with the trust Head of Safeguarding and CEO

#### **Low-Level Concerns**

- 9.5 A low-level concern is defined as any behaviour by a member of staff, supply staff, contractor, or volunteer towards a child that does not meet the harm threshold but raises doubts about their conduct, professional boundaries, or suitability to work with children. Examples include breaches of the Staff Code of Conduct, unprofessional conduct, or behaviour that could be misinterpreted.
- 9.6 All low-level concerns must be reported to the Headteacher, who will record, review, and address them in line with Romero Catholic Academy Trust's Low-Level Concerns procedure. This process is intended to create a culture of openness and transparency, enabling early intervention and reducing the risk of issues escalating. Any pattern of low-level concerns may be reviewed and, if necessary, escalated under the harm threshold procedures.
- 9.7 By managing both harm threshold allegations and low-level concerns consistently and transparently, the Trust safeguards children effectively, supports staff in maintaining professional boundaries, and promotes a culture of integrity and accountability.

## APPENDIX 1

### Flowchart of procedures for responding to safeguarding concerns

