

ST-EDS

Employability skills for young people



Safeguarding Children and Vulnerable Adults Policy

SAFEGUARDING POLICY FOR UNREGISTERED ALTERNATIVE PROVISION INCORPORATING CHILD PROTECTION

St Edmunds Society

Policy Consultation & Review

This policy is on our website and is available on request from admin@st-eds.org.uk. We provide commissioners with this policy during pre-placement planning, and we also inform parents and carers about this policy when their children join our setting.

We recognise the expertise our staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff at induction alongside our Staff Handbook and behaviour policy. In addition, all staff are provided with Part One of the statutory guidance '[Keeping Children Safe in Education](#)'.

All staff receive training on safeguarding procedures at Norfolk Children's Safeguarding Partnership on joining the company. An annual update is provided in August. In addition, all staff are provided with [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#) staff are required to read Part One following the updates every September, and sign to say that they have read and understood the document.

This policy will be reviewed in full by the Director of Pastoral and Partnerships on an annual basis.

This policy was last reviewed in November 2025.

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1. KEY CONTACTS

Name	Role	Email	Telephone
Hannah Shirley	Trustee Safeguarding Lead		01603 622035
Becky Jordan	Director of Pastoral and Partnerships (DSP)	Rebecca.jordan@st-eds.org.uk	01603 622035
Amy Hannant	Lead DSP (Welfare Manager)	Amy.hannant@st-eds.org.uk	01603 622035
Mollie Firman	Designated Safeguarding Person		01603 622035
Hannah Baldwin	Designated Safeguarding Person		01603 622035
Criszel Mallari	Designated Safeguarding Person		01603 622035
Kayleigh Dawson	Designated Safeguarding Person		01603 622035
Chelsea Pegg	Designated Safeguarding Person		01603 622035
Laura Dallas	Designated Safeguarding Person		01603 622035
Tessa Pinfold	Designated Safeguarding Person		01603 622035
Serena Davenport	Designated Safeguarding Person		01603 622035
Norfolk CADS			A staff member or volunteer can call 0344 800 8021 A parent or member of the public can call 0344 800 8020
Suffolk CADS			0808 800 4005
Local Authority Education Duty Desk	Advice where there is a concern about an adult working with a child		01603 307797
LADO	Making referrals about an adult who may have caused harm to a child, using LADO referral form	LADO@norfolk.gov.uk	Call the Duty Desk above for advice before making a LADO referral
Suffolk LADO		ladocentral@suffolk.gcsx.gov.uk	0345 606 1499

Norfolk Police			999 emergency or 101 non- emergency
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If you feel it is an emergency call the Police on 999.

If the DSPs are unavailable anyone with a safeguarding concern can contact The Children's Advice and Duty Service (CADS).

- A staff member or volunteer can call (0344 800 8021) and choose from the following options:
- Option 1-the child or young person is currently being supported by a Social Worker or Family Practitioner.
- Option 2-your call relates to Child Exploitation.
- Option 3-your call relates to Domestic Abuse.

For all other Safeguarding Concerns please hold until your call is answered.

- A parent or member of the public can call (0344 800 8020).

Norfolk Safeguarding Children Partnership (NSCP)

www.norfolkscb.org

Safer Programme

01603 228966

safer@norfolk.gov.uk

Ofsted

enquiries@ofsted.gov.uk

Charity Commission

0300 066 9197

Our staff can be reached Monday – Friday, 8.30am – 4.30pm.

Unregulated alternative provision settings must have due regard to the safeguarding of the children attending the placement. As noted in [Working together to safeguard children - GOV.UK \(www.gov.uk\)](#), Rapid reviews and child safeguarding practice reviews have highlighted that missed opportunities to record, understand the significance of, and share information in a timely manner can have severe consequences for children

Within this policy, where the guidance is clear that the commissioner should be informed the following applies in all cases, where the child:

- is on a school roll, contact the DSL at the home school
- is under the remit of the [Alternative Education Service \(Section 19 team\) - Schools \(norfolk.gov.uk\)](#), contact the relevant adviser/key contact

- is in care, and the placement has been commissioned by the [Virtual School for Children in Care and Previously in Care - Schools \(norfolk.gov.uk\)](https://www.norfolk.gov.uk/virtual-schools), contact the relevant adviser/key contact
- is electively home-educated, contact an adviser within [Home Education - Schools \(norfolk.gov.uk\)](https://www.norfolk.gov.uk/home-education)

2. Purpose and Aims

The purpose of St Edmunds Society's (St Ed's) safeguarding policy is to ensure every child who attends the setting is safe and protected from harm. This means we will always aim to be:

- 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 impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

We provide Vocational Education to young people and vulnerable adults from age 11 – 25. The purpose of St Ed's Safeguarding Children and Vulnerable Adults Policy is to ensure every young person (under the age of 18) and vulnerable adult who is a student at St Eds is safe and protected from harm.

A vulnerable adult is someone who is over the age of 18 and who is, or may be, unable to take care of themselves or unable to protect themselves against significant harm, exploitation or radicalisation.

This policy will give clear direction to all staff, visitors, commissioners, parents and carers and children about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our setting.

St Eds fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who attend our setting. The elements of our policy are prevention, protection and support. This policy applies to all children, staff, commissioners, parents and carers, and visitors.

We will always work to:

- Identify those at risk and protect young people and vulnerable adults at the College from maltreatment;
- Prevent impairment of our young people and vulnerable adults' health or development, or access to education
- Ensure that young peoples' and vulnerable adults' development takes place in circumstances consistent with the provision of safe and effective care
- Undertake that role to enable our young people and vulnerable adults to have the best outcomes.
- Ensure St Eds is a safe environment
- Ensure all staff have a responsibility to provide a safe environment in which students can learn

3. Our Ethos

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies.

The child's welfare is of paramount importance at St Eds. Our setting will establish and maintain an ethos where young people feel secure, are encouraged to talk, are listened to and are safe. Young people at our setting will be able to talk freely to any member of staff if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

We recognise that staff at our setting play an important role as they are able to identify concerns and provide help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff must always act in the **best interests** of the child.

At St Eds we ensure that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child at their heart.

Where there is a safeguarding concern, the child's wishes and feelings are considered when determining what action to take and what services to provide. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Our systems are designed to ensure that (where applicable) schools and other commissioners, such as the local authority, are informed **without delay** where there is a safeguarding concern.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a child's disclosure and how to record and report the information. We will not make promises to any child, and we will not keep secrets. Every child will know what the adult will have to do with any information they have disclosed. All staff will be trained to recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. At all times we will work in partnership and endeavour to establish effective working relationships with schools, other commissioners, parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children](#) and the [Norfolk Multi Agency Safeguarding Partnership arrangements](#).

St Eds recognises that pupils who may benefit from unregulated AP are often the most vulnerable children. They may have special needs (with or without an Education Health and Care Plan [EHCP]), medical needs, attendance difficulties, challenging behaviour, experienced adverse child experiences and trauma, a social worker, be suspended, at risk of permanent exclusion, in care and/or known

to supporting agencies such as the Youth Justice Service for example. St Eds understands that children attending AP may feel more at ease (than at school, for example) and therefore make disclosures more readily than in school.

St Eds will ensure that **pre-placement**, if applicable the following information is recorded:

- If a school is the commissioner, the name and contact details for the home school's Designated Safeguarding Lead
- If the local authority is the commissioner, the name, telephone number and email for the local authority officer commissioning the placement and/or key contact at the Virtual School for Children in Care or Previously in Care, as appropriate
- A clear service level agreement on how safeguarding concerns will be communicated, followed up and by whom, and how regular communication between the home school/commissioner and St Eds will be assured
- Pupil-specific risk assessment
- Emergency contact details for the pupil
- Key medical information

Additional guidance on pre-placement procedures is available at [Unregulated alternative provision templates - Schools \(norfolk.gov.uk\)](https://www.norfolk.gov.uk/unregulated-alternative-provision-templates-schools)

At St Eds we understand the importance of working in a way that adheres to the following legislation:

- The Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty

This means we do not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

14-16 year olds

Although education takes place all around the centre, there are designated and identifiable areas for the sole provision, of education and support for 14 to 16-year-olds.

4. Roles and Responsibilities

The proprietor Becky Jordan of St Eds is responsible for ensuring that:

- all staff carry out all the requirements of this policy
- all staff work in a way that will safeguard and promote the welfare of all children attending the setting
- all staff receive appropriate safeguarding induction on appointment
- all staff are adequately trained to carry out safeguarding duties
- all staff maintain timely and detailed records of safeguarding
- the Designated Safeguarding Persons have sufficient time to carry out their duties
- this policy is reviewed and updated annually
- all staff read and sign annually to say they have read and understood Part One of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk) procedures are in place for dealing with allegations against members of staff
- procedures are in place for promptly informing schools and commissioners of safeguarding concerns
- safeguarding records are maintained confidentially and securely
- safer recruitment practices are followed
- placement procedures to St Eds include detail on when and how safeguarding concerns are reported back to schools and other commissioners, if applicable
- placement paperwork includes contact details for the commissioning schools' Designated Safeguarding Person
- sufficient information is provided to visitors on how to report a safeguarding concern via our sign-in system and a poster in reception

4.2 The Lead Designated Safeguarding Person, Amy Hannant is responsible for:

- informing schools and commissioners of safeguarding concerns without delay, if applicable
- maintaining accurate safeguarding records
- ensuring that safeguarding records are maintained confidentially and securely
- maintaining an accurate central log of home school Designated Safeguarding Lead and/or other commissioner contact details, if applicable

Our Designated Safeguarding Persons will liaise with Children's and or Adult Services and other agencies where necessary and make referrals to The Children's Advice and Duty Service or Local Authority Designated Officer when required.

Any concern for a student's safety or welfare will be recorded on CPOMS and allocated to a Designated Safeguarding Person who will be responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow.

5. SAFER WORKING PRACTICES FOR STAFF AND VOLUNTEERS

5.1 Recruitment

We will always try to prevent inappropriate people from seeking employment or volunteering to work with children, young people and vulnerable adults.

We will always adhere to the Norfolk Safeguarding Children Partnership's procedures, including specifically the Safer Workforce Policies and Procedures.

Job description and person specification

We will consider the tasks and skills necessary for the job or voluntary position and what kind of person is most suited to the job. We will clearly define the role and agree this with relevant personnel.

Recruitment publicity

We will circulate all vacancies widely. We will ensure any advert contains a commitment to safer recruitment and safeguarding children and vulnerable adults.

Written application form

We will insist on a written application form. This should include personal details such as name, past names, past and current work/volunteering experience, and details of qualifications. It should also include explanation of all gaps in employment. Applicants should also provide current and recent addresses for the past 5 years.

Selection criteria

We will decide how the person should behave with children and vulnerable adults, and what attitudes we want to see.

We will develop a list of essential and desirable qualifications, skills and experience and select people against this.

Written Declaration

We will remind applicants that posts involving working with children and vulnerable adults are exempt from the Rehabilitation of Offenders Act.

We will ask for a statement in writing that they have no past or current convictions, cautions or bind-overs and no pending court cases

Identification

We will ask for photographic documentation to confirm identity, such as passport or driving licence, and, for example, a utility bill that contains their address.

Qualifications

We will ask to see the original documents of any qualifications.

Interview

We will interview face to face, preferably with at least two representatives from the group or organisation. We will discuss with the applicant information contained in their application form and explore their attitudes towards working with children and vulnerable adults. This also provides an opportunity to discuss our Safeguarding policy and to ensure that the applicant has the ability and commitment to meet the standards required.

We will talk about the application including:

- Areas in which you want to know more details
- Gaps in employment history
- Vague statements or unfamiliar qualifications
- Frequent changes of employment

Staff files are in place and contain evidence of:

- a. Application forms containing
 - personal details (current and former names, current address and national insurance number)
 - details of their present (or last) employment and reason for leaving
 - full employment history
 - qualifications
 - details of referees
 - a statement of personal qualities and experience
- b. A self-declaration of any criminal record or information which may make them unsuitable to work with children
- c. Evidence of right to work in the UK
- d. Photocopies of identity checks (with a photograph)
- e. At least 2 references, including 1 from the applicant's current or most recent employer
- f. A risk assessment (if required)
- g. Interview notes which include a safeguarding question
- h. Photocopies of qualifications

Staff tracker or single central record which includes:

- i. Name and address of employee/volunteer
- j. Date employment started
- k. Date identity checks carried out and by whom
- l. Date DBS checked and by whom
- m. Risk assessment in place yes/no
- n. Right to work in the UK checks – when and by whom
- o. Qualifications check – when and by whom
- p. Prohibition order checks- when and by whom (for those in 'teaching activity')

5.2 Safer recruitment

Three members of the Management Team have completed the Safer Recruitment Training for Norfolk and Suffolk. At all times we will ensure that safer recruitment practices are followed, broadly in line with those detailed in Part 3 of [Keeping children safe in education](#). At least one person involved in conducting an interview will have received safer recruitment training.

We will use the recruitment and selection process to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities.

We require details of a candidate's present (or last) employment and reason for leaving; full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment and evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, and shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

We use a range of selection techniques to identify the most suitable person for the post. Structured questions are agreed by the interview panel and any potential areas of concern are explored to determine the applicant's suitability to work with children.

We will undertake Disclosure and Barring Service (DBS) checks on all staff, volunteers and trustees to ensure we are recruiting and selecting the most suitable people to work with children. We will always gain enhanced DBS disclosures if appropriate to the role. When the results of the DBS check and all recruitment checks have been completed and we are satisfied the applicant is suitable for the role we will allow the staff member or volunteer to have contact with children and vulnerable adults.

We will maintain a Single Central Record (SCR) of all safer recruitment checks carried out in line with recommendations from [Keeping children safe in education](#). A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements.

We recognise that safer recruitment is not just about carrying out the right DBS checks and is not limited to recruitment procedures. Therefore, we understand the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

If applicable, as per paragraph 334 of [Keeping children safe in education](#) we will ensure that written confirmation is provided to all home schools and commissioners that appropriate safeguarding checks have been carried out on our staff, i.e., those checks that the school would otherwise perform in respect of its own staff.

5.3 Induction and Probationary Period

We will ensure volunteers or workers receive a comprehensive induction, in line with our Induction Policy.

We expect a normal probationary period to be 6 months, during which time the volunteer or worker will regularly work under the supervision of a more experienced volunteer or worker, such as management.

When new staff join St Eds they will be informed of the safeguarding arrangements in place. All staff will annually be sent a copy of this safeguarding policy, the Staff Handbook, behaviour policy and Part One of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/352822/Keeping_children_safe_in_education_-_GOV.UK_(www.gov.uk).pdf). All staff are expected to read these key documents and sign a log to record that all have been read and understood. They will also be provided with contact details for the Designated safeguarding persons and information about how to record and report safeguarding concerns.

The induction will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive online safety training, including understanding the expectations, applicable roles, and responsibilities in relation to filtering and monitoring as this is part of the overarching safeguarding approach of our setting.

If there are concerns during the probationary period, the volunteer or staff member will not be offered a permanent position.

5.4 Staff Training and Volunteers

Every new member of staff will receive safeguarding training during their induction period within 3 months of joining St Eds. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record concerns, the processes for referral to Children's Services and the remit of the safeguarding team. This training is renewed every 3 years. Training is delivered by the Norfolk Safer Children's Partnership.

We actively encourage all our staff to keep up to date with the most recent local and national safeguarding advice and guidance. This can be accessed via **www.norfolkscb.org**

Every member of the welfare team will complete Designated Safeguarding Person training every 3 years.

Relevant staff also receive First Aid, Mental Health First Aid and Medication Administration training.

In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of Keeping children safe in education - GOV.UK (www.gov.uk). In order to achieve this, we will ensure that:

- all staff undertake appropriate annual safeguarding training, and the Director of Pastoral and Partnerships will evaluate the impact of this training
- all staff receive regular safeguarding and child protection updates via staff meetings/training/briefing, as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children

All staff, volunteers and commissioners will be informed of our safeguarding procedures, including how to contact the designated safeguarding person(s), how to record a concern and pass it on. Parent carers will be signposted to the policy on our website.

Our board of trustees will also undertake appropriate training to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust approach to safeguarding at St Eds. This training takes place at induction and is updated regularly.

6 Procedures for managing concerns

St Eds adheres to child protection procedures that have been agreed locally through the [Norfolk Safeguarding Children Partnership](#). Where we identify children and families in need of support, we will notify the commissioner without delay (if applicable) and work in partnership with them and other agencies which may subsequently become involved.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasion, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the designated safeguarding persons to pass this information on to the relevant pathways.

It is not the responsibility of St Eds staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

The Designated Safeguarding Persons should be used as a first point of contact for concerns and queries regarding any safeguarding concern at St Eds. Any

member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to a Designated Safeguarding Person.

All concerns about a child or young person should be reported **without delay** on CPOMS, alerting the DSP and Welfare team.

Records should include:

- a clear and comprehensive summary of the concern
- the time and date that the concern was communicated to the home school/commissioner (if applicable)
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

Following receipt of any information raising concern, the Designated Safeguarding Person will pass this on without delay to:

- The home school Designated Safeguarding Lead, or
- Other commissioner, or
- [Services to Home Educators Team](#) if the child is electively home educated by their parent, or
- The relevant Norfolk County Council officer e.g. for a Post-16 student

If, at any point, there is a **risk of immediate serious harm** to a child a referral should be made to [Children's Advice and Duty Service \(CADS\)](#) immediately on **0344 800 8021**. Anyone can make a referral in these circumstances. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the designated safeguarding persons. Concerns should always lead to help for the child at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Norfolk Children's Advice & Duty Service, or the police if:

- the situation is an emergency and all Designated Safeguarding persons, and the Director of Pastoral and Partnerships are unavailable
- they are convinced that a direct report is the only way to ensure the child's safety.

Any staff member who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the proprietor. If any staff member does not feel the situation has been addressed appropriately at this point should contact [Children's Advice and Duty Service \(CADS\)](#) directly with their concerns.

Information will only be shared within the organisation on a need to know basis for the protection of the student. All information is confidential, however if there is a safeguarding concern about a student, then information can be shared with other agencies, namely the Police or Children's/Adult Services.

If the placement is under the remit of the **Alternative Education Service** (AES Section 19 team), or **Virtual school** for looked after and previously looked after children - Norfolk County Council, concerns will be addressed to the relevant adviser for the young person.

6.1 Handling disclosures

A student may decide to disclose information that may indicate they are suffering from abuse or neglect. A student chooses to speak to an adult because they feel that they will listen and that they can trust them. The adult needs to listen to what the student has to say and be very careful not to 'lead' the student or influence in any way what they say.

It is important that the adult remembers to:

- Stay calm
- Listen and be supportive
- To not ask any leading questions, interrogate the student, put ideas in the student's head or jump to conclusions
- Not stop or interrupt a student who is recalling significant events
- Never promise the student confidentiality – it must be explained that information will need to be passed on to help keep them safe
- Avoid criticising the alleged perpetrator
- Tell the student what must be done next (the safeguarding process must be followed)
- Record what was said immediately as close to what was said as possible. Also record what was happening immediately before the student disclosed. Be sure to record on CPOMS.
- Contact the designated person immediately
- Seek support

The Children's Advice and Duty Service (CADS)

If we have an emergency, we will call the Police on 999.

We will contact CADS when there are concerns about a child's safety or wellbeing, and we believe they may be at risk of harm. This includes:

- Immediate Safeguarding Concerns - where a child is at risk of significant harm, including physical, emotional, sexual abuse, or neglect.
- Escalating Concerns - Where previous support or interventions have not improved

the situation and concerns are increasing.

- Concerns About Parenting Capacity - Where a parent or carer's ability to meet a child's needs is compromised due to issues such as substance misuse, mental health, or domestic abuse.
- Professional Consultation - Where the situation is complex and you require advice or guidance on appropriate next steps.

We will contact CADS on their direct line: 0344 800 8021.

We will choose from the following options:

- Option 1 -the child or young person is currently being supported by a Social Worker or Family Practitioner.
- Option 2 -your call relates to Child Exploitation.
- Option 3 -your call relates to Domestic Abuse.

For all other Safeguarding Concerns please hold until your call is answered.

We will have the following information ready before contacting CADS:

- all of the details known to your organisation about the child (including DOB, current address, contact details for the family, the family composition including siblings, and where possible extended family members and anyone important in the child's life)
- the nature of the concern and worries
- history of the family (including significant events)
- any work/support you have provided to the child or family to date.
- where the child is now
- whether you have informed parents/carers of your concern

When considering whether to contact CADS we will consult the CADS Flowchart (see Appendix) and CADS FAQs on the NSCP Website Page [How to Raise a Concern | Norfolk Safeguarding Children Partnership | PWWC](#). We will also consult the [Norfolk Guidance to Understanding Continuum of Needs | NSCP | PWWC](#) produced by the Norfolk Safeguarding Children Partnership (NSCP).

We will gain consent from the parent to contact CADS, unless the concerns being raised suggest that the child or someone else (including the referrer) would be placed at risk of significant harm, or it might undermine the investigation into a serious crime.

Reasons for not seeking consent should be clearly stated when contacting CADS and recorded on internal systems for our records.

We will have a discussion with a Consultant Social Worker.

A copy of the discussion will be securely emailed to us.

We will follow the advice given.

We will keep written dated records of all conversations with CADS, for our own safeguarding recording process.

We will not investigate and will be led by the Local Authority and/or the Police.

We understand if we are unhappy about a decision made by CADS, we can use the Resolving Professional Disagreements policy on [Norfolk Safeguarding Children Partnership](#)

Parents or members of the public can contact CADS on 0344 800 8020

Requesting Early Help support

For concerns that do not meet the above threshold, Early Help support & guidance can be accessed via [Request for support - Norfolk County Council](#).

Early Help is designed to support children, young people, and families experiencing difficulties that may affect their wellbeing, development, or ability to flourish. It aims to:

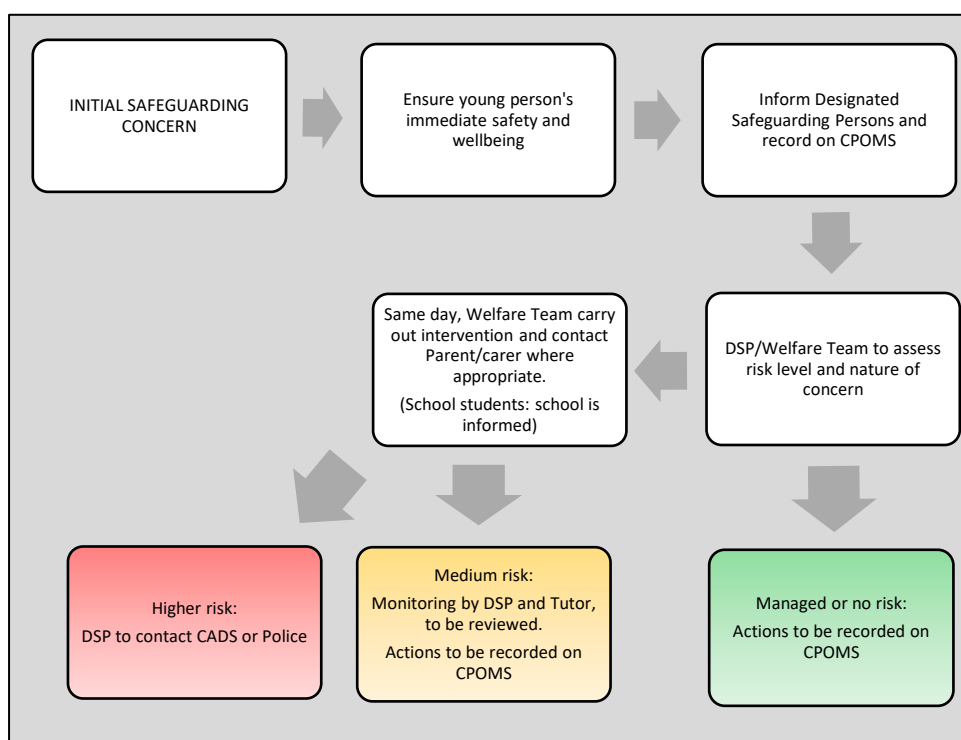
- Prevent problems from escalating by addressing issues early.
- Support the wider family context, including parents, carers, and siblings.
- Improve outcomes such as school attendance, mental health, and relationships.
- Encourage multi-agency working, bringing together professionals to create a coordinated support plan.
- Empower families by focusing on strengths and helping build resilience.

Concerns about Radicalisation and Extremism

If we have concerns that a child or young person could be vulnerable to radicalisation, we will follow the procedure in Appendix.

Procedures for Handling Disclosures

St Ed's internal Safeguarding flow chart:



Specific Safeguarding Issues

7.1 Contextual safeguarding

At St Eds we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the setting's environment and/or can occur between children outside of the setting. This is known as contextual safeguarding. It is key that all school staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse or exploitation in situations outside their families. Through training we will ensure that staff and volunteers are aware that extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible for the Designated Safeguarding Person to report, to provide a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

At St Eds we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

At St Eds we recognise that a **previously looked after child** potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. During pre-placement arrangements, we will ensure that key contacts for the Virtual School are named, and agreement is reached on how and when the Virtual School should be informed of a safeguarding concern.

7.2 Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and serious violence

At St Eds we train staff to recognise that both **CSE and CCE** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

We recognise that CSE is a form of child sexual abuse, and this imbalance of power coerces, manipulates or deceives a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. CSE does not always include physical contact, it can also occur through the use of technology. We understand that some children may not realise they are being exploited e.g., they may believe they are in a genuine romantic relationship.

We understand that CCE is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs.

We understand that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

At St Eds, staff are aware of the indicators and risk factors which may signal a child is vulnerable to or involved with serious violent crime. We make reference to the Home Office's Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults: county lines guidance for more information.

7.3 So-called 'honour-based violence (including Female Genital Mutilation (FGM) and Forced Marriage)

At St Eds we recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of FGM and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV, they should inform the Designated Safeguarding Person immediately.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. [Section 5B of the Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory Reporting of Female Genital Mutilation-procedural information](#) Home Office (January 2020).

At St Eds we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information: Contact 020 7008 0151 or email fm@fco.gov.uk

7.4 Preventing radicalisation and extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At St Eds we will ensure that:

- through training, staff have an understanding of what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise
- there are systems in place for keeping children safe from extremist material when accessing the internet in our setting by using effective filtering and usage policies
- the Designated Safeguarding Persons have received Prevent training and will act as the point of contact for any concerns relating to radicalisation and extremism
- the Designated Safeguarding Person(s) may make referrals in accordance with [Prevent duty - Norfolk Schools and Learning Providers - Norfolk County Council](#) and may represent our setting at Channel meetings as required

Section 26(1) of the CTSA (County Terrorism and security act) imposes a statutory duty on "specified authorities", when exercising their functions, "to have due regard to the need to prevent people from being drawn into terrorism".

From 1 July 2015 all schools and registered later years childcare providers are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

For St Eds to fulfil the Prevent duty, it is essential that staff can identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of schools' and childcare providers' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. At St Eds we endeavour to provide a safe space in which children, young people and staff can understand the risks associated with

terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The Prevent duty is entirely consistent with St Eds safeguarding policy and existing responsibilities and should not be burdensome. Ofsted's revised Education Inspection Framework for education, skills, and early years, which came into effect from 14 November 2019, makes specific reference to the need to have safeguarding arrangements to promote pupils' welfare and prevent radicalisation and extremism.

Amy Hannant, Kayleigh Dawson, Laura Dallas and Criszel Mallari, Mollie Firman, Chelsea Pegg, Hannah Baldwin and Tessa Pinfold are the on-site PREVENT Designated Officers.

7.5 Child on child sexual violence and sexual harassment

At St Eds all staff are trained so that they are aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- upskirting
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals

We recognise that children are vulnerable to physical, sexual and emotional abuse by other children or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff and volunteers to remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between children; and that consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) is a form of child on child abuse.

We understand, that even if there are no reports in our setting it does not mean it is not happening, it may be the case that it is just not being reported. We recognise that children may not find it easy to tell staff about their abuse and can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, and this may come from a friend or a conversation that is overheard. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child on child abuse and they will always challenge this. It must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case

scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

At St Eds we regularly review decisions and actions, and relevant policies are updated to reflect any lessons learnt. We look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we decide upon an appropriate course of action.

At St Eds all staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. We will also offer appropriate support to the perpetrator and any other children involved.

All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child on child abuse.

We will work with other agencies including the police and Children's Services, as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren). Where appropriate, we will share risk assessments and/or advice from the HSB team with the commissioner.

Support will depend on the circumstances of each case and the needs of the child, it may include completion of risk assessments to support children to remain in the setting whilst safeguarding other children and the victim, delivery of early intervention in respect of HSB and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) where a pupil discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The assault does not have to have taken place in Norfolk, but the victim must live in Norfolk to access support. The SARC also has a 24/7 helpline 01603 276381 if pupils or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website.

7.6 Modern Slavery

At St Eds we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature.

7.7 Safeguarding responses to children who go missing

At St Eds all staff should be aware of the safeguarding responsibilities for children who are absent or go missing from the setting, particularly on repeat occasions, to

help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

At St Eds we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who missing:

- an attendance register is taken at the start of each session
- attendance (positive attendance, lateness and absences) is reported to the home school/commissioner at 10am if applicable
- we hold at least two emergency contact numbers for each student wherever possible
- if a pre-16 child absconds from St Eds, the home school/commissioner and parent/carer will be informed immediately.
- staff will alert the Designated Safeguarding Person(s) to any concerns raised regarding children who are absent
- children will not be given permission to leave the AP site during the session, unless, for example, it is for a pre-arranged appointment or trip, or they have prior consent from the school and parent/carer
- any absence concerns will be discussed with the commissioner without delay

7.8 Mental Health

At St Eds all staff are made aware, through training, that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

We understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how children's experiences, can impact on their mental health, behaviour and education. All staff are aware that if they have a mental health concern about a child that is *also* a safeguarding concern, they should take immediate action by passing the information on to the Designated Safeguarding Person(s).

7.9 Online Safety

At St Eds all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently online and in daily life. We know that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered, We will ensure online safety is a running and interrelated theme and is reflected in relevant policies, staff training, the role and responsibilities of the Designated Safeguarding Person(s) and any parental engagement.

At St Eds we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children face in our setting. For example, as a setting, we commit to ensuring that:

- colleagues using the internet to carry out work tasks must do so with regard to our online safety policy
- colleagues will not use personal mobile and/or smart watch devices in front of children, nor use them to record any images or videos of children accessing our setting
- colleagues will respect the rules regarding social media, as outlined in our online safety policy
- parent carer consent will be sought regarding photo consent
- if photographs are taken of children for the purposes of recording progress, these will be stored securely

We have an 'ICT and Online Safety' policy for students which includes safe use of photography and video, social media sites and mobile phones, as well as guidance on online abuse.

7.10 Cybercrime

We understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

7.11 Domestic Abuse

At St Eds all staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. We understand that children can be victims of domestic abuse. Where they see, hear or experience the effects this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. We are aware of the [Norfolk](#)

[Integrated Domestic Abuse Service \(NIDAS\)](#) and signpost victims to the service. Norfolk and Suffolk Victim Care are available to offer support where threshold for NIDAS support has not been met.

7.12 Children with special educational needs and disabilities or physical health issues

At St Eds we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

We work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

We also recognise that pupils who attend Alternative Provision will often have complex needs and due to this we are aware of the additional risk of harm these children may be vulnerable to.

7.13 Children who are lesbian, gay, bi or trans (LGBT)

The fact that a child or a young person may be lesbian, gay, bisexual or questioning their gender is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education', we recognise that these children and in some cases children who are perceived by other children to be lesbian, gay or bisexual can be just as vulnerable as children who are. Therefore, we work to reduce any additional barriers faced and provide a safe space for these children to speak out or share their concerns with members of staff. Through our curriculum, we counter homophobic, biphobic and transphobic bullying and abuse.

7 Recording and Information Sharing

If staff are concerned about the welfare or safety of any child at St Eds, they will record their concern via CPOMS. Any concerns should be passed to the safeguarding lead without delay.

Child protection information will only be shared within the setting on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.

Child protection information will be kept up to date. Each concern logged will include:

- a clear and comprehensive summary of the concern and when it was logged
- details of how and when the home school/commissioner was informed, if applicable
- a note of any action taken, decisions reached and the outcome

We will keep detailed, accurate, secure records of all concerns, discussions and decisions made including the rationale for those decisions. This includes instances where referrals were or were not made to another agency such as the Children's Advice and Duty Service or the Prevent programme. Invitations to child protection conferences, core groups and all other multi-agency meetings and minutes taken at these will be stored on the child's CPOMS file. All our safeguarding records will include a chronology, contents front cover and will record significant events in the child's life.

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's electronic file.

8 Working with commissioners

If applicable, St Eds communicates primarily with the home school or commissioner where there are safeguarding concerns. We are committed to working in partnership with home schools, commissioners and parent and/or carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

When new children join our setting, home schools, commissioners and parent and/or carers (if the child is home-educated) will be informed that we have a safeguarding policy. A copy will be provided on request and is available on our website. Parent and/or carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to contact the [Children's Advice and Duty Service \(CADS\)](#).

We are committed to working with parent and/or carers positively, openly and honestly. We ensure that all parent carers are treated with respect, dignity and courtesy. We respect parent carers' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.

To keep children safe and provide appropriate care for them, St Eds requires commissioners and parent and/or carers to submit accurate and up to date information regarding:

- full names and contact details of all adults with whom the child normally lives
- full names and contact details of all persons with parental responsibility (if different from above)
- emergency contact details (if different from above)
- full details of any other adult authorised by the parent/carer to collect the child from the setting (if different from the above)

We will retain this information on the child's file. The setting will only share information about children with adults who have parental responsibility or where a parent carer has given permission and we have been supplied with the adult's full details in writing.

9 Child Protection conferences

Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

For a Pre-16, the home school/commissioner would normally be the education representative at such meetings. However, our staff members may be asked to attend a child protection conference or core group meetings in respect of individual children. The person representing St Eds at these meetings will be a Designated Safeguarding Person. The person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.

All reports for child protection conferences will be prepared in advance using the information and templates available at [How to Raise a Concern | Norfolk Safeguarding Children Partnership | PWWC \(norfolkscp.org.uk\)](#). When completing a chronology, we will refer to the Multi Agency Chronologies-Practice Guidance Document 2024 and the completed chronology examples, all of which can be accessed at [Norfolk Guidance to Understanding Continuum of Needs | NSCP | PWWC \(norfolkscp.org.uk\)](#) under the 'Genogram & Chronologies Resources and Guidance' tab. The information contained in the report will be shared with parents/carers before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at St Eds. In order to complete such reports, all relevant information will be sought from staff working with the child.

10 Safer Working Practice

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

All staff and volunteers will be provided with a copy of the Staff Handbook at induction. They will be expected to know our Professional Boundaries and carry out their duties in accordance with this advice.

If staff or volunteers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts, who they are with and for how long. Doors should have a clear visual panel in them and be left open.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in [Safer Recruitment Consortium training information](#) (February 2022). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Please refer to our organisation's home visits policy for community spaces as applicable.

11 Managing allegations against staff and volunteers

12.1 Allegations that may meet the harms threshold

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in [Working together to safeguard children \(2023\)](#) and [Keeping Children Safe in Education](#). An allegation may relate to a person who works/volunteers with children who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The 4th bullet point above recognises circumstances where a member of staff is involved in an incident outside of St Eds which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

We recognise our responsibility to report/refer allegations or behaviours of concern and/or harm to children by adults in positions of trust who are not employed by us to the LADO service directly at lado@norfolk.gov.uk These are adults such as those in the voluntary sector, taxi drivers, escorts, and foster carers.

We will take all possible steps to safeguard our children and to ensure that the adults in our setting are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in the local protocol [Allegations Against Persons who Work with Children](#) and Part 4 of [Keeping Children Safe in Education](#) are adhered to and will seek appropriate advice. The first point of contact for settings regarding concerns and/or allegation issues is via the **Local Authority Education Duty Desk on 01603 307797**. A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service then the [LADO referral form](#) should be completed. The completed LADO referral form is then sent via email to: LADO@norfolk.gov.uk.

If an allegation is made or information is received about *any* adult who works/volunteers in our setting which indicates that they may be unsuitable to work/volunteer with children, the member of staff receiving the information should inform the Director of Pastoral and Partnerships immediately. Should an allegation be made against the Director of Pastoral and Partnerships, this will be reported to the CEO.

The Director of Pastoral and Partnerships will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

Any member of staff who does not feel confident to raise their concerns with the Director of Pastoral and Partnerships should contact the LADO directly via email to lado@norfolk.gov.uk.

Further [information and guidance documents in relation to the LADO process](#), forms, leaflets and the Allegations against Persons who Work/Volunteer with Children Procedures are found on the Norfolk Safeguarding Children Partnership website. Further national guidance can be found at: [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

St Eds has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our setting, a referral

will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. If we need guidance on making a Barring Referral, we will contact the [East of England DBS Outreach Advisor](#) for support.

In the case of a teacher employed by St Eds, we will also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if the teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first.

12.2 Concerns that do not meet the harm threshold

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. In Norfolk the 'low level' concern process is to consult with the **Local Authority Education Duty Desk on 01603 307797**. We recognise a low-level concern to be something which is

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

We promote an open and transparent culture in which all concerns about all adults working in or on behalf of the setting (including volunteers) are dealt with promptly and appropriately. Through training, staff are made aware of what low level concerns are and understand the importance of reporting these concerns in writing.

At St Eds staff report all low level concerns to the Designated Safeguarding Person(s) or to the Director of Pastoral and Partnerships. If reported to the Designated Safeguarding Person(s), they will inform the Director of Pastoral and Partnerships, who will always be the ultimate decision maker in respect of all low-level concerns

Through training and induction, we ensure that all staff understand the importance of self-referring, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

We understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and take action when needed. This could be through a disciplinary process but also by referring to the **Local Authority Education Duty Desk on 01603 307797**. Please note, where a child, parent carer or staff member makes an allegation of harm, this

will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.

We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

12 Relevant policies and guidance

To underpin the values and ethos of our setting and our intent to ensure that children are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff Handbook
- Professional Boundaries Policy
- Behaviour and Rewards Policy - which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Recruitment & Selection which adheres to Part 3 of [Keeping Children Safe in Education](#).
- Health and Safety Policy
- Harassment and discrimination including racial abuse
- Medical Policy
- ICT and Online safety
- Whistleblowing
- Confidentiality and information sharing
- GDPR
- Complaints and Appeals
- Exclusion Policy
- Equality and Diversity
- SEND

This policy makes reference to the following publications

[8.3 Allegations Against Persons who Work/Volunteer with Children - Norfolk Safeguarding Children Partnership \(norfolkscb.org\)](#)

[Alternative provision - GOV.UK \(www.gov.uk\)](#)

[Independent school registration - GOV.UK \(www.gov.uk\)](#)

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)

[Keeping children safe in out-of-school settings: code of practice - GOV.UK \(www.gov.uk\)](#)

[Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](#)

[Policies and Procedures - Norfolk Safeguarding Children Partnership](#)

[Working together to improve school attendance - GOV.UK \(www.gov.uk\)](#)

[Working together to safeguard children - GOV.UK \(www.gov.uk\)](#)

As well as the below relevant policies:

[What to do if You're Worried a Child is Being Abused 2015](#)

[Children Act 2004](#)

[Children Act 1989](#)

[Norfolk Continuum of Needs](#)

[The Prevent duty: safeguarding learners vulnerable to radicalisation 2022](#)

[Prevent duty guidance: England and Wales 2023](#)

[Section 157 Education Act 2002](#)

[Criminal exploitation of children, young people and vulnerable adults - county lines 2023](#)

[Online Safety Bill](#)

[After-school clubs, community activities and tuition: safeguarding guidance for providers 2023](#)

[Mental Health and Behaviour in Schools 2018](#)

[Special educational needs and disability code of practice: 0 to 25 years 2015](#)

APPENDIX 1 - Keeping Children Safe In Education 2024

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

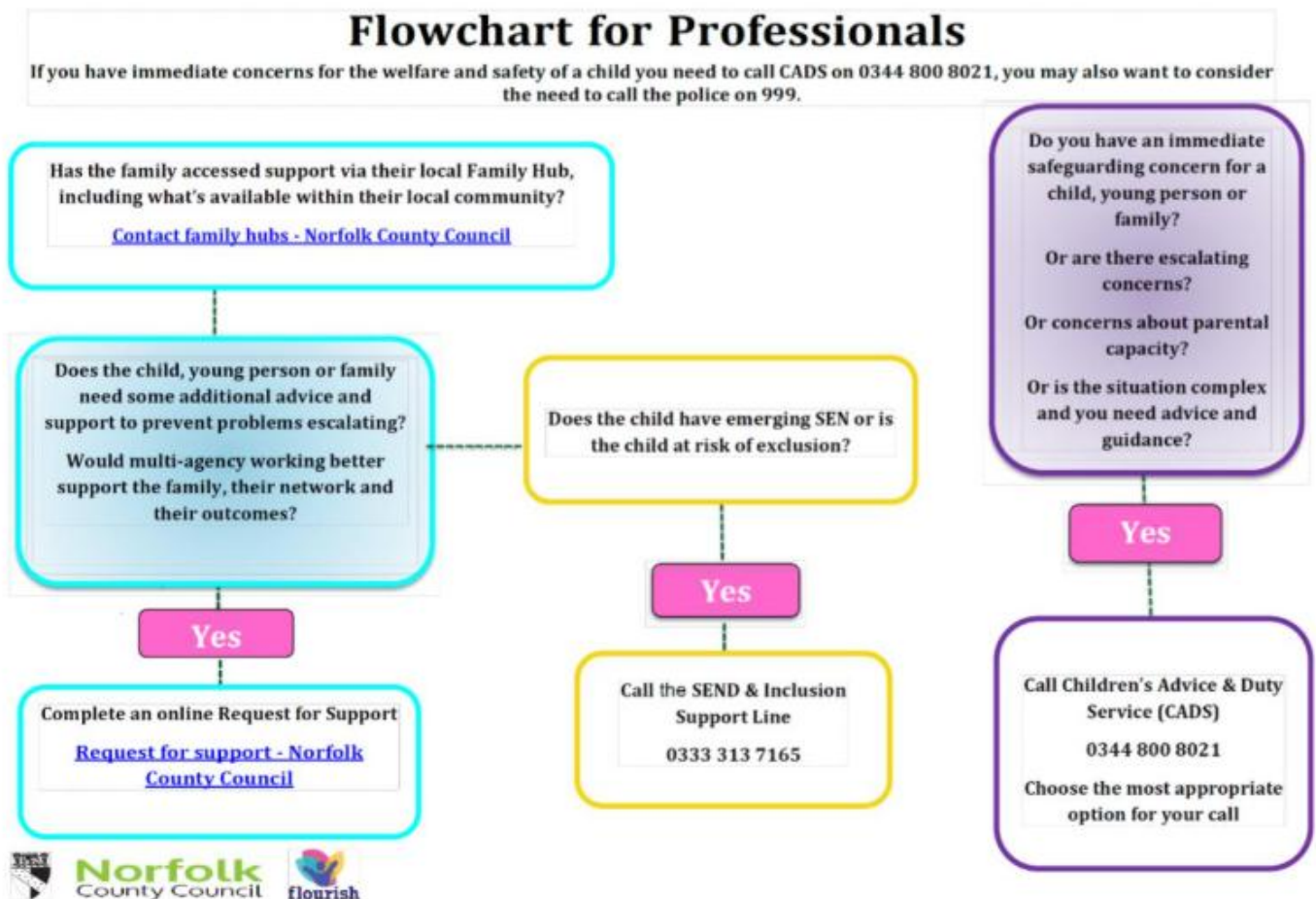
³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

APPENDIX 2 - Childrens Advice and Duty Service Norfolk

The CADS Flowchart for Professionals below, the CADS FAQs and further information on making a referral can be accessed here: [How to Raise a Concern | Norfolk Safeguarding Children Partnership | PWWC](#)



Appendix 3 - Local safeguarding procedures

Children's Advice and Duty Service (CADS)

[Children's Advice and Duty Service \(CADS\) Norfolk County Council | Norfolk Community Directory](#)

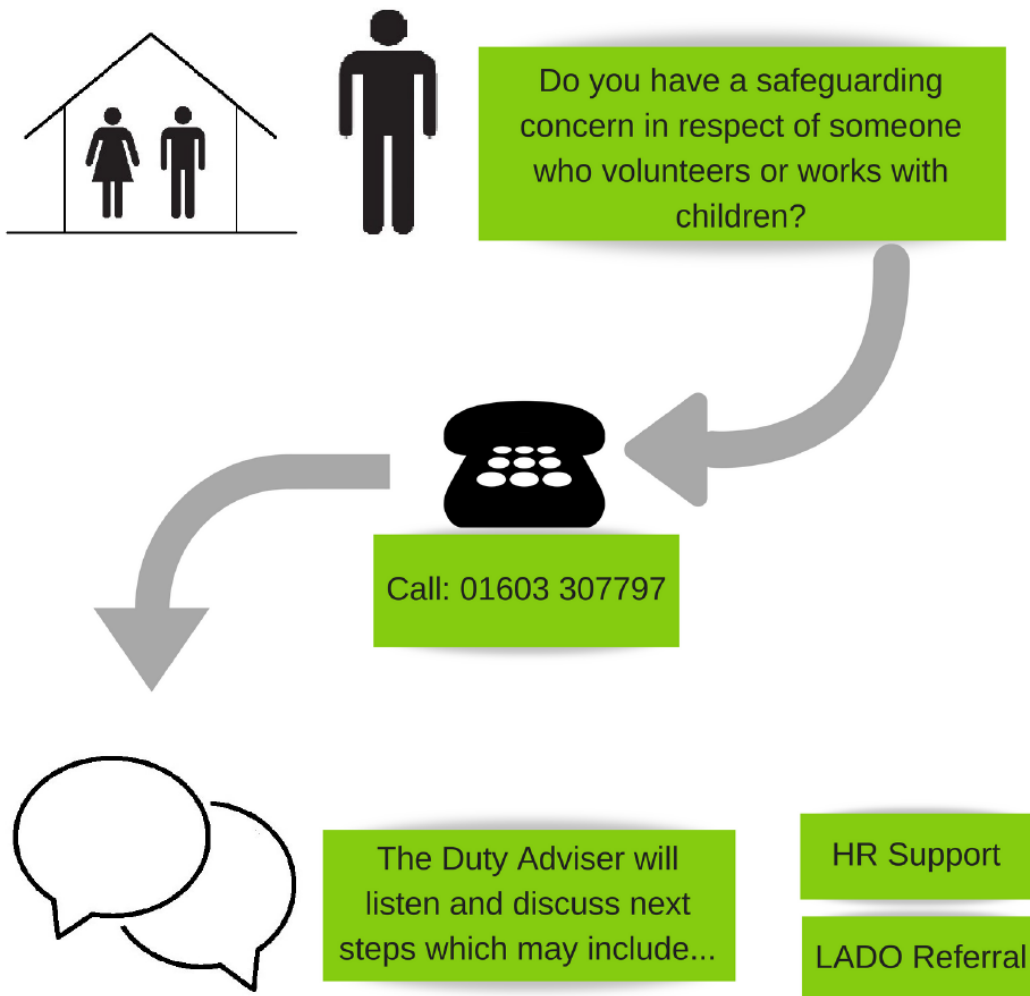
Before contacting CADS, please answer the following questions and follow the advice provided.

1. **Can you evidence that the child is experiencing or likely to suffer significant harm?**
 - a. **Yes**
 - i. Do you have the consent of the parent/carer/young person to make contact with CADS or have you informed them of your intention to do so?
 1. **Yes**
 - a. Gather all the family's details including dates of birth, current address, current and working contact details and family composition, along with the history and current worries. Ensure that you have to hand details of any support already provided to the child or family.
 2. **No**
 - a. Inform the parent/carer and/or gain their consent for you to make this contact unless doing so would put the child at risk
 - b. **No**
 - i. Have you discussed the child's needs with your safeguarding lead or your line manager?
 - ii. Discuss the child with your safeguarding lead or line manager if available and follow their advice when providing support to the family
2. **Call CADS on the professionals only phone line 0344 800 8021.**
3. **Make a record of the discussion.**
4. **Follow the advice given by the consultant social worker.**
5. **Keep a record for your own setting's recording process**
6. **The contact number for parents, carers and members of the public is 0344 800 8020.**

Guidance for Schools, Colleges & Alternative Education Providers

Education Quality Assurance & Intervention Service

Duty Desk



Appendix 5

The Prevent Duty in Norfolk Procedure

PREVENT - Prevent is part of the UK's Counter-terrorism strategy CONTEST. The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. The key terms to be aware of are as follows:

Extremism - the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation - refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

Responding to a Concern-Notice – Check – Share

Notice-A staff member or volunteer working with a child or young person could be the person to notice that there has been a change in the individual's behaviour that may suggest they are vulnerable to radicalisation. Every case is different, and there is no checklist that can tell us if someone is being radicalised or becoming involved in terrorism. There are some common signs that may mean someone is being radicalised.

- Expressing an obsessive or angry sense of injustice about a situation and blaming this on others.
- Expressing anger or extreme views towards a particular group such as a different race or religion.
- Suggesting that violent action is the only way to solve an issue, sharing extreme views or hatred on social media.

Check-The next step is for the staff member/volunteer to speak to the manager or safeguarding lead to better understand the concerns raised by the behaviours observed to decide whether intervention and support is needed. In many cases there will be an explanation for the behaviours that either requires no further action or a referral not related to radicalisation or extremism.

Share-Where the staff member/volunteer still has concerns that the individual may be vulnerable to radicalisation, then the organisation's safeguarding procedures will be followed, and this safeguarding concern will be reported to (CADS). Following this the Prevent referral form should be completed, which can be downloaded from here [Preventing radicalisation - Norfolk County Council](#) and sent to: preventreferrals-NC@Norfolk.police.uk

An initial assessment of the referral will be carried out prior to any further information gathering on the individual.

For urgent radicalisation concerns contact Norfolk police on 101 or, in an emergency, 999.

Additional information and guidance on Prevent is available on the NCC website [Preventing radicalisation - Norfolk County Council](#)

Need advice or support? If it's not an emergency, please get in touch by emailing <mailto:prevent@norfolk.police.uk>

You can also contact the Norfolk Police Prevent team on **01953 423905** or **01953 423896**.