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 2026*.

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 2026 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 August 2026.

Contents

1 Purpose and Aims

2 Our Ethos

3 Roles and Responsibilities

4 Training and Induction

5 Procedures for managing concerns

6 Specific Safeguarding Issues

7 Records and Information Sharing

8 Working with Parents, Carers and Commissioners

9 Child Protection Conferences

10 Safer Recruitment

11 Safer Working Practice

12 Managing Allegations Against Staff and Volunteers

13 Relevant policies

14 Statutory Framework

1 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 work to:

- Provide help and support to meet the needs of children and young people as soon as problems emerge.
- Protect children from maltreatment, whether that is within or outside the home, including online.
- Prevent impairment of our children's and young people's mental and physical health or development.
- Ensure that children and young people at St Eds grow up in circumstances consistent with the provision of safe and effective care.
- Undertake that role to enable children and young people at St Eds to have the best outcomes.

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 including supply staff, volunteers, visitors and parents 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.

We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from school or who go missing from education, particularly for prolonged periods and/or on repeat occasions. The Attendance Officer will regularly liaise with the Designated Safeguarding Lead to discuss all persistently absent students and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

This policy applies to all students, staff, parents, trustees, volunteers and visitors.

2 Our Ethos

The child's welfare is of paramount importance. We will establish and maintain an ethos where students feel secure, are encouraged to talk, are listened to and are safe. Children at St Eds 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.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that our staff play a particularly important role as they are in a position to identify concerns early 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 members 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 taken into account 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.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this 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 chosen to disclose. 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, neglected, at risk of exploitation, serious violence or modern slavery, and/or they may not recognise their experiences as harmful.

Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online). The Relationships Education, Relationships and Sex Education and Health Education will cover relevant topics in an age and stage appropriate way, enabling students to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources. We will achieve this by regular Enrichment Sessions, tailored Welfare Support, and our Calendar of Culture.

Further information can be found in the DfE guidance 'Teaching online safety in school' and 'Relationships Education, Relationships and Sex Education and

Health Education' This education is underpinned by our Behaviour Policy and Welfare support system.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children 2026 and the Norfolk Multi Agency Safeguarding Partnership arrangements.

As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory
- Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour,
- including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently
- excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

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
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 – 'Data protection laws'

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

St Eds recognises that students 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
- Student-specific risk assessment
- Emergency contact details for the student
- Key medical information

Additional guidance on pre-placement procedures is available at Unregulated alternative provision templates - Schools (norfolk.gov.uk)

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.

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 2026**,** 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 Transitional 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), contact the relevant adviser/key contact
- is electively home-educated, contact an adviser within Home Education - Schools (norfolk.gov.uk)

3 Roles and Responsibilities

Name	Role	Email	Telephone
Becky Jordan	Director of Pastoral and Partnerships (DSP) Mental Health First Aider	rebecca.jordan@st-eds.org.uk	01603 622035
Amy Hannant	Lead DSP (Welfare Manager) Mental Health First Aider	amy.hannant@st-eds.org.uk	01603 622035
Tom Braithwaite	Designated Safeguarding Person		01603 622035
Chelsea Pegg	Designated Safeguarding Person		01603 622035
Grace Warren	Designated Safeguarding Person		01603 622035
Criszel Mallari	Designated Safeguarding Person		01603 622035
Laura Dallas	Designated Safeguarding Person		01603 622035
Tessa Pinfold	Designated Safeguarding Person		01603 622035
Sara Hewett	Designated Safeguarding Person		01603 622035
Serena Davenport	Designated Safeguarding Person Mental Health First Aider		01603 622035
Joe Crossley	CEO	joe.crossley@st-eds.org.uk	01603 622035
Hannah Shirley	Trustee Safeguarding Lead		01603 622035

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

It is the responsibility of every member of staff, volunteer and regular visitor to St Eds to ensure that they carry out the requirements of this policy and, at all times,

work in a way that will safeguard and promote the welfare of all of the students. This includes the responsibility to provide a safe environment in which children can learn.

The Trustees
The Trustees are accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Trustee Board takes collective responsibility to safeguard and promote the welfare of our students, we also have a named trustee who champions safeguarding within St Eds.

The Trustee Board will ensure that:

- The safeguarding policy is in place, is reviewed annually, is available publicly via our website and has been written in line with Local Authority guidance and the requirements of the Norfolk Safeguarding Children Partnership policies and procedures.

- We contribute to inter-agency working in line with Working Together to Safeguard Children (2026).

- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL(s) who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description.

- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the behaviour policy and the safeguarding response for those students who are absent from education as detailed in section 6 of this policy.

- All staff undertake appropriate child protection training that is updated annually and online safety training.

- Ensure that appropriate filtering and monitoring systems are in place and that a review of their effectiveness is carried out at least once every academic year by SLT member with responsibility for filtering and monitoring.

- Ensure that appropriate cyber security systems are in place.

- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance.

- Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'* (2026);

- They remedy without delay any weakness in our safeguarding arrangements that are brought to their attention.

The Trustee Board will receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any outstanding training requirements. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual students.

The CEO

The CEO is responsible for:

- Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL).
- Identifying alternate members of staff to act as the Designated Safeguarding Lead (DSL) in his/her absence to ensure there is always cover for the role.
- Ensuring that the policies and procedures adopted by the trustees, particularly concerning referrals of cases of suspected abuse, neglect or exploitation, are followed by all staff.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff or volunteer.
- Will ensure that suitable arrangements for any alternative provision are in place.

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of *'Keeping Children Safe in Education'*.

The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in writing and given to the DSL.

During term time the designated safeguarding lead and or a deputy will always be available (during school or college hours) for staff to discuss any safeguarding concerns. If in exceptional circumstances, a DSL is not available on site in person, we will ensure that they are available via telephone and/or any other relevant media.

The DSL will represent our setting at child protection conferences and core group meetings. Through appropriate training, knowledge and experience our DSL will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of children.

The DSL will maintain records and child protection files ensuring that they are kept confidential and stored securely (see section 7 for more information.)

The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained to the agreed safeguarding training package provided by Children's Services.

The DSL will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a care leaver.

The DSL(s) will work with the CEO and senior leaders, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement.

This will include understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential.

We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes. The DSL will ensure that staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

The DSL will take the lead responsibility for understanding the filtering and monitoring systems and processes in place.

4 Training & Induction

When new staff join they will be informed of the safeguarding arrangements in place. They will be given a copy of our safeguarding policy along with the staff handbook, Part one of '*Keeping Children Safe in Education*' and told who our Designated Safeguarding Leads (DSL) are. They will also receive a copy of the behaviour policy and the attendance policy. All staff are expected to read these key documents. They will also be provided with information about how to record and report safeguarding concerns using our electronic recording system CPOMS.

Every new member of staff or volunteer will receive safeguarding training during their induction period within three months of joining. 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, the processes for referral

to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Lead (DSL). The training 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 our overarching safeguarding approach.

This training is renewed every 3 years. Training is delivered by the Norfolk Safer Childre's Partnership and is renewed every three years. 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'*. In order to achieve this, we will ensure that:

- all members of staff will undertake appropriate safeguarding training on an annual basis, and we will evaluate the impact of this training.
- all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All regular visitors, temporary staff and volunteers will be given a set of our safeguarding procedures; they will be informed of whom our DSL and alternate staff members are and what the recording and reporting system is, via our Inventry sign in system, and Safeguarding Posters in reception. Parents and carers will be signposted to the policy on our website.

The DSL, the alternate designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by Norfolk Safeguarding Children's Partnership at least once every three years. The DSL and alternate(s) will attend Designated Safeguarding Lead (DSL) training provided by the Local Authority every two years. In addition to formal training, DSLs will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role.

This is completed by regular Continued Personal Development, disseminating national and local updates to staff through staff training days and weekly briefings, and attendance at DSL network meetings.

Our 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 whole school approach to safeguarding. This training takes

place at induction and is updated regularly. Training for Trustees to support them in their safeguarding role is available from Norfolk Governor Services.

We actively encourage all our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Part One of 'Keeping Children Safe in Education' (2026) provides links to guidance on specific safeguarding issues such as Child Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via Norfolk Safeguarding Children Partnership and within the Safeguarding Toolkit on the Norfolk Schools and Learning Providers website.

5 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 carry out our responsibilities in accordance with Norfolk Local Assessment Protocol and the Norfolk Continuum of Need Guidance.

Every member of staff including volunteers working with children at St Eds are advised to maintain an attitude of '*it could happen here'* where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outline in this policy.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, 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 DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

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 Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern. Any member of staff or visitor who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a child or young person should be reported without delay and recorded on CPOMS, alerting the DSPs. Records should include:

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

Following receipt of any information raising concern, the DSL will consider what action to take which could include completing the Request for Support form or seeking advice from the Norfolk Children's Advice & Duty Service (CADS) as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

The Designated Safeguarding Person may 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

All referrals will be made in line with Norfolk Children's Services procedures as outlined in Appendix 1.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Norfolk CADS immediately. Anybody 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 DSL and/or the Director of Pastoral and Partnerships. 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 CADS, or the police if:

- the situation is an emergency and the designated senior person, their alternate and the CEO are all unavailable.

- they are convinced that a direct report is the only way to ensure the student's safety.

Any member of staff 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 CEO or the Chair of Trustees. If any member of staff does not feel the situation has been addressed appropriately at this point should contact Norfolk 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 **Transitional Education Service** (TES 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 Specific Safeguarding Issues

Contextual safeguarding
At St Eds we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school environment and/or can occur between children outside of education. This is known as contextual safeguarding. It is key that all staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse, exploitation or serious violence 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 violence. When reporting concerns, staff should include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Children with special educational needs and disabilities or physical health issues

We recognise that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges, and these are discussed in staff training. These additional vulnerabilities may include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- children with SEN and disabilities can be disproportionally impacted by behaviours such as- without outwardly showing any signs.
- communication barriers
- the need for intimate care. and more likely to be dependent on adults for care.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

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 students 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.

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. When dealing with looked after children and previously looked after children, it is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

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

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 Child Sexual Exploitation 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. Child sexual exploitation 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 criminal exploitation of children 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.

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 the Children's Society Preventing Child Sexual Exploitation guidance for more information.

Serious violence is seen as a continuing safeguarding concern; Staff are trained and alert to the signs a child may be at risk or involved in serious violence. We are aware there are times of the school day where children may be at higher risk and respond accordingly. Where staff report concerns, the DSL will gather contextual information, provide early support for those considered at risk and dependent on the risk implement a safety and support plan.

If a child is suspected to be at risk of exploitation, serious violence, or modern slavery, a referral to the Children's Advice and Duty Service (CADS) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of exploitation.

So-called 'honour-based abuse (including Female Genital Mutilation and Forced Marriage)

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA, they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

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. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: Mandatory Reporting of Female Genital Mutilation- procedural information Home Office (January 2020).

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. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. 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 fmu@fco.gov.uk.

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. We will ensure that:

- Through training, staff, volunteers and trustees have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping students safe from extremist material when accessing the internet in our school by using effective filtering and monitoring policies.
- The DSL has received Prevent training and will act as the point of contact for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with Norfolk Channel Procedures and will represent St Eds at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of students.

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 Counterterrorism 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 students 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 students' welfare and prevent radicalisation and extremism.

Our on-site PREVENT Designated Officers:

Amy Hannant, Tom Braithwaite, Chelsea Pegg, Laura Dallas, Criszel Mallari and Tessa Pinfold.

Child-on-child abuse (including harassment and violence)

All staff are trained so that they are aware that safeguarding issues can manifest themselves via child-on-child abuse. These forms of harm may include an online element which facilitates, threatens and/or encourages abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children,
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
- serious physical assault and harm, or the threat of harm with a weapon,
- sexual violence such as rape, assault by penetration and sexual assault,
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual making or sharing of nudes and semi nudes,
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm,
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group).

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 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-nude images and or videos 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 students 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's 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.

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.

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. The DSL will respond to any concerns related to child-on-child abuse in line with guidance outlined in Part five of 'Keeping Children Safe in Education.' We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.

We will work with other agencies including the police and Children's Social Care, 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).

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 school 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 student 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 helpline 01603 276381 if students or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website. The DSL will always contact the police in cases of rape and serious sexual assault as per the guidance When to call the Police: a guide for schools and colleges, National Police Chiefs Council.

Modern Slavery

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. for concerns of this nature.

Safeguarding responses to children who are absent from education.

We adhere to the 'Working Together to Improve School Attendance' (2026) guidance. All staff should be aware of their safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

We adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are absent from education:

- An attendance register is taken at the start of the first session of each day and after break and lunch.
- We make every effort to contact parents and carers and follow up with the emergency contacts held.
- We hold at least two emergency contact numbers for each of the students on our roll wherever possible.
- Staff will alert DSLs to any concerns raised regarding children who are absent.
- The DSLs will meet regularly with the Attendance Officer, EHCP Coordinator and other members of the pastoral team to ensure that each response is thorough and takes into account all the relevant information about individual children.
- We will follow the procedures outlined in our attendance policy including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- We understand we remain responsible for the safeguarding of all students who are placed in an alternative provision.
- When removing a child from roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files.

More details can be found in our Attendance Policy for Post-16 and School students.

Mental Health

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 and that in some cases, mental health concerns can develop into safeguarding concerns. 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, neglect or exploitation, 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 (which could include self-harm, signs of an eating disorder or contemplating suicide), they

should take immediate action by passing the information on to a Designated Safeguarding Lead.

We have named Mental Health First Aiders. There are clear systems and processes in place for identifying possible mental health problems and work with other agencies as required to respond to these concerns. Designated Safeguarding Leads make reference to the 'Mental Health and Behaviour in Schools' DfE guidance for further support.

Online Safety

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 via online channels 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 throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

More details can be found in our policies on Online Safety and Phone Use.

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. We also communicate with parents and carers to reinforce the importance of children being safe online.

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). We are aware of the Cyber security standards for schools and colleges.GOV.UK and the guidance from the National Education Network.

If there are concerns about a child in this area, the designated safeguarding lead will consider a referral to the Cyber Choices programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Domestic Abuse

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.

Children who are lesbian, gay, bisexual or questioning their gender

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 and behaviour policy, we are clear that bullying and disrespectful language or behaviour is never appropriate.

7 Records and Information Sharing

If staff are concerned about the welfare or safety of any child, they will record their concern through the setting's electronic system CPOMS. Any concerns should be passed to the DSL without delay. Any information recorded will be kept on CPOMS and not with the child's academic file. These files will be the responsibility of the DSL.

Child protection information will only be shared within St Eds 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.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.
- details of how and when the home school/commissioner was informed, if applicable

We will keep detailed, accurate, secure written 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 CPOMS.

When a child joins us, we will review any safeguarding information received and contact the previous setting to seek clarification where information is unclear or incomplete.

8 Working with Parents, Carers and Commissioners

St Eds is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

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 Norfolk Children's Advice & Duty Service.

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.

We will seek to share with parents any concerns we may have about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to Norfolk CADS in those circumstances where it is appropriate to do so.

In order to keep children safe and provide appropriate care for them, the school requires parents/carers and commissioners to provide 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 to collect the child from school (if different from the above).

We will retain this information on the student file. We will only share information about students with adults who have parental responsibility for a student or where a parent has given permission, and we have been supplied with the adult's full details.

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.

Staff members may be asked to attend a child protection conference or core group meetings on behalf of the education provider in respect of individual children. Usually, the person representing St Eds at these meetings will be the DSL. In any event, 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 guidance and template report provided by the Norfolk Safeguarding Children Partnership. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional, and intellectual development, the child's presentation at school and information about attendance. To complete such reports, all relevant information will be sought from staff working with the child.

Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children, and our aim is to achieve this in partnership with our parents.

10 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 in accordance with 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 checks, and other pre-employment checks as outlined in 'Keeping Children Safe in Education' to ensure we are recruiting and selecting the most suitable people to work with our children. We will also undertake DBS checks on all volunteers and trustees.

We will maintain a Single Central Record (SCR) of all safer recruitment checks carried out in line with statutory requirements. 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.

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

Induction and Probationary Period

We will ensure volunteers or workers receive a comprehensive induction. 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 2026. 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.

11 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 will be provided with a copy of our Staff Handbook at induction. They will be expected to know our Professional Boundaries and Standards for positive handling and carry out their duties in accordance with this advice. There will be occasion when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for safe restraint must be adhered to. A list of staff that have accessed Norfolk Steps training will be kept by the CEO.

If staff, visitors, volunteers or parent helpers 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, ideally, should have a clear glass 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 'Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings' (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.

12 Managing Allegations Against Staff & Volunteers

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' (*2026) and *'Keeping Children Safe in Education'*, DfE (2026) below. 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 he or she 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 (including supply and trainee teachers) or volunteer 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 St Eds to the LADO service directly at lado@norfolk.gov.uk These are adults such as those in the voluntary sector, taxi drivers, escorts, and fosters carers.

We will take all possible steps to safeguard our children and to ensure that the adults at St Eds 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'*, DfE (2026) are adhered to and will seek appropriate advice. The first point of contact for schools regarding concerns and/ or allegation issues (including for supply teachers) 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 e-mail to: LADO@norfolk.gov.uk. See Appendix 1 for further details.

If an allegation is made or information is received about any adult who works/ volunteer 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. This includes concerns relating to agency and supply staff and volunteers. Should an allegation be made against the Director of Pastoral and Partnerships, this will be reported to the CEO.

In the event that neither the Director of Pastoral and Partnerships nor CEO is not contactable on that day, the information must be passed to and dealt with by the Director of Education and Delivery or the Chair of Trustees.

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.

Where concerns are raised about an individual and we are not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that we will usually take the lead in conducting an investigation as we have direct access to any affected children and other staff to collect the facts.

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 – the 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, 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.

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 Professional Boundaries and Standards Policy, 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 St Eds (including volunteers and contractors) are dealt with promptly and appropriately. Through training, staff are made aware of what low level concerns are and understand the importance of reporting and these types of concerns in writing.

Staff report all low-level concerns to the DSL or to the Director of Pastoral and Partnerships. If reported to the DSL, then the DSL will inform the Director of Pastoral and Partnerships of the concern in a timely fashion. The Director of Pastoral and Partnerships 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 the 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. 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.

13 Relevant Policies

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

- Professional Boundaries and Standards Policy
- Staff Handbook
- Anti-Bullying
- 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'*.
- Whistleblowing
- Attendance
- ICT, Online Safety and Phone Use
- Health and Safety
- Harassment and discrimination including racial abuse
- Medical Policy
- GDPR
- Complaints and Appeals
- Exclusion Policy
- Equality and Diversity
- SEND

14 Statutory Framework

This policy has been devised in accordance with the following legislation and guidance:

- Working Together to Safeguard Children DfE (2026)
- Keeping Children Safe in Education DfE (2026)
- Working Together to Improve School Attendance, DfE (2026)
- Norfolk Safeguarding Children Partnership procedures
- Norfolk Safeguarding Children Partnership Protocol: Allegations Against Persons Who Work with Children
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (Feb 2022)
- What to do if you're worried a child is being abused DfE (March 2015)
- Information sharing: advice for practitioners providing safeguarding services
- The Prevent duty: Departmental advice for schools and childcare providers DfE (September 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (September 2023)
- Mandatory Reporting of Female Genital Mutilation- procedural information Home Office (January 2020)
- Multi-agency practice principles for responding to child exploitation and extra-familial harm
- Child sexual exploitation: guide for practitioners DFE (February 2017)
- Teaching online safety in school DfE (January 2023)
- Mental Health and Behaviour in Schools DfE (November 2018)
- Data protection: toolkit for schools DfE (2026)
- Promoting the education of children with a social worker (March 2025)
- Preventing youth violence and gang involvement
- Criminal exploitation of children and vulnerable adults: county lines
- Relationships Education, Relationships and Sex Education (RSE) and Health Education
- Domestic Abuse Act 2021 Statutory Guidance (Home Office April 2023)
- Allergy safety in schools - GOV.UK DfE (July 2026)

APPENDIX 1

Children's Advice and Duty Service
Safeguarding process**:**

1. **Identify & Assess Risk**: Identify child at potential or actual risk.

2. **Consult DSL**: Report concerns to your organisation's Designated Safeguarding Lead and document them (e.g., CPOMS) and follow advice regarding contacting CADS or completing a Request for Support.'

3. **Immediate Protection**: If the child is in immediate danger, call 999.

4. **Contact CADS if child protection or immediate safeguarding concerns**.

5. **Professionals** call **0344 800 8021** and choose from the following options:
   - **Press 1** – if the child or young person is currently being supported by a Social Worker or Family Practitioners
   - **Press 2** – if your call relates to Child Exploitation.
   - **Press 3** – if your call relates to Domestic Abuse.
   - **Press 0** – for Child Protection and immediate safeguarding concerns.
   - (If the lines are busy and your call is not answered within 40 minutes, a call back option will be offered).
   - To use the service, **members of the public** can call the Customer Service Centre number **0344 800 8020**.

6. **Request Support for Universal, Community based Early Help and Family Help Complete a Request for Support form:**

Targeted early help and community-based support 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.

Consent: Inform parents/carers of the concerns and gain consent for support from Early Help services, prior to a call or completing a Request for Support unless doing so places the child at further risk.

Universal services and community-based early help

Universal outcomes and community based early help provide preventative support for children and families of all ages, strengthening resilience, improving outcomes, and reducing the risk of needs escalating. Delivered as a coordinated local system rather than a single service, this support is offered through universal provision such as education, health, and wider community services.

It includes services like Best Start Family Hubs, youth, and housing support, and after school provision.

Best Start Family Hubs offer a clear pathway from pregnancy to age 19 (or 25 for young people with SEND), bringing together multi agency partners to provide accessible, ongoing community support and to safeguard families, including those transferring from targeted or specialist services.

Family Help – targeted early help, safeguarding, and promoting the welfare of children.

Family Help is offered where universal services and community based early help have not achieved sufficient or sustained improvement, or where a child and family present with multiple, complex, or escalating needs. Delivered through a coordinated, multi-agency approach led by Children's Services and its partners, Family Help provides structured support to address identified risks and concerns. Family Help will only be initiated where there is an agreed Family Plan, or a Graded Care Profile (GCP) in cases of neglect, which has been shared with CADS.

Family Help is a voluntary, consent-based approach that supports families to build capacity, improve outcomes, and reduce risks, including families in kinship arrangements and those requiring additional support during pregnancy, with the aim of preventing the need for statutory child protection intervention.

Consent: Inform parents/carers of the concerns and gain consent for support from Early Help services, prior to a call or completing a Request for Support unless doing so places the child at further risk.

7. **CADS:** A member of the team responds to the call or Request for Support and decides on next steps.

8. **Information Gathering**: MASH partners (police, health, social care) share information if required.

9. **Outcome & Action:**
   Information, advice, and guidance
   Community based Early Help
   Family Help

10. **Feedback:** Following a call CADS provides feedback to the referrer regarding the outcome.

APPENDIX 2
Advice for schools, colleges and alternative education providers where there are concerns about an adult who works within the setting.

Norfolk County Council

Guidance for Schools, Colleges & Alternative Education Providers

Education Quality Assurance & Intervention Service

Duty Desk



Do you have a safeguarding concern in respect of someone who volunteers or works with children?



Call: 01603 307797



The Duty Adviser will listen and discuss next steps which may include...

HR Support

LADO Referral

APPENDIX 3

Useful contact details

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	Call the Duty Desk above for advice before making a LADO referral LADO@norfolk.gov.uk
Suffolk LADO		0345 606 1499 ladocentral@suffolk.gcsx.gov.uk
Norfolk Police		999 emergency 101 non- emergency

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.norfolklscb.org

Safer Programme
01603 228966
safer@norfolk.gov.uk

Ofsted
enquiries@ofsted.gov.uk

Charity Commission
0300 066 9197

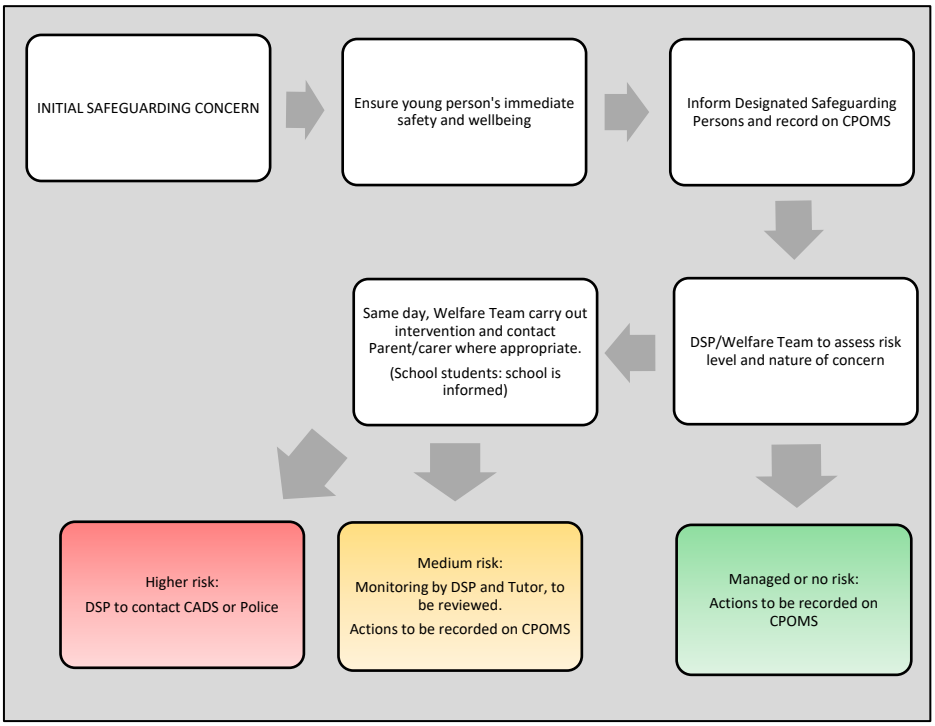
APPENDIX 4

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 be 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

St Ed's internal Safeguarding flow chart:



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.**