



## Action Community Enterprises (ACE)

# Safeguarding, Incorporating Child Protection Policy



<b>Policy number:</b>	SP01
<b>Version:</b>	4.0
<b>Policy holder:</b>	Lou Gardiner
<b>Approval board:</b>	ACE Board of Directors
<b>Date of original approval:</b>	September 2014
<b>Date of latest approval:</b>	September 2023
<b>Review period:</b>	Annually
<b>Date of next review:</b>	September 2024

### **Action Community Enterprises CIC**

Viking House, Dewing Road, Rackheath Industrial Estate, Norwich, NR13 6PS. Company No. 7663378  
Tel: 01603 72030, Email: [info@ace-project.org.uk](mailto:info@ace-project.org.uk)

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# **Safeguarding Incorporating Child Protection Policy**

## **Policy Consultation & Review**

This policy is available on our organisation's website and is available on request from the central office. We also inform parents and carers about this policy when their children and young people and young people join us.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance 'Keeping Children Safe in Education', DfE (2022). This policy will be reviewed in full by the Board of Directors on an annual basis.

## **1. PURPOSE & AIMS**

1.1 The purpose of ACE's safeguarding policy is to ensure every child and young person who is a registered student at our centre is safe and protected from harm. This means we will always work to:

- Protect children and young people and at our centre from maltreatment;
- Prevent impairment of our children and young people's health or development;
- Ensure that children and young people at our centre grow up in circumstances consistent with the provision of safe and effective care;
- Undertake that role so as to enable children and young people at our centre to have the best outcomes.

1.2 This policy will give clear direction to staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all students at our centre.

1.3 Our centre's fully recognise the contribution they can make to protect children and young people from harm and supporting and promoting the welfare of all children and young people who are registered as a student at our centre's. The elements of our policy are prevention, protection and support.

1.4 We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children and young people who are absent from the centre's or who go missing from education. We also recognise that safeguarding against

radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.

1.5 This policy applies to all students, staff, parents, board of directors, volunteers and visitors.

## 2. OUR ETHOS

2.1 The child's welfare is of paramount importance. Our centre's will establish and maintain an ethos where students feel secure, are encouraged to talk, are listened to and are safe. Children and young people at our centre's will be able to talk freely to any member of staff at a centre if they are worried or concerned about something.

2.2 Everyone who comes into contact with children and young people and their families has a role to play in safeguarding children and young people. We recognise that staff at our centre's play a particularly important role as they are in a position to identify concerns early and provide help for children and young people to prevent concerns from escalating. **All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.**

2.3 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.

2.4 Throughout our curriculum we will provide activities and opportunities for children and young people to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage children and young people to develop essential life skills.

2.5 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 (2022).

## 3. ROLES AND RESPONSIBILITIES

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Lauren Gardiner	01603 720308
Alternate DSL	Lou Gardiner Danielle Lindoff	01603 720308 01603 720308
Managing Director	Lauren Gardiner	01603 720308

<b>Named Safeguarding Director</b>	<b>Julia Howard</b>	<b>01603 720308</b>
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3.1 It is the responsibility of every member of staff, volunteer and regular visitor to our centre 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 at this centre. This includes the responsibility to provide a safe environment in which children and young people can learn.

### **The ACE Board**

3.2 The ACE Board is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Board takes collective responsibility to safeguard and promote the welfare of our students, we also have a named board member who champions safeguarding within the centre.

3.3 The Board of Directors will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our centre website and has been written in line with Local Authority guidance and the requirements of the Norfolk Safeguarding Children Partnership (NSCP) policies and procedures;
- The centre contributes to inter-agency working in line with Working Together to Safeguard Children (2022);
- A member of the senior leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is an alternate and appropriately trained member of staff identified to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role;
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct;
- All staff undertake appropriate child protection training that is updated regularly;
- 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' DfE (2022);
- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

3.4 The board of directors 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 for the centre. 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**

3.5 At ACE the CEO is responsible for:

- Identifying a member of the senior leadership team to be the Designated Safeguarding Lead (DSL);
- Identifying an alternate member 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 board of directors, particularly concerning referrals of cases of suspected abuse and neglect, 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.

## **The Designated Safeguarding Lead (DSL)**

3.6 The Designated Safeguarding Lead(s) will carry out their role in accordance with the responsibilities outlined in Annex B of *'Keeping Children and Young People 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.

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

3.8 The DSL will maintain written records and child protection files ensuring that they are kept confidential and stored securely.

3.9 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 within the centre to the agreed centre's safeguarding training pack provided by Children and Young People's Services.

## 4. TRAINING & INDUCTION

4.1 When new staff, volunteers or regular visitors join our centre they will be informed of the safeguarding arrangements in place. They will be given a copy of our centre's safeguarding policy along with the staff code of conduct and told who our Designated Safeguarding Lead (DSL) is. They will also be provided with the recording form, given information on how to complete it and who to pass it to.

4.2 Every new member of staff or volunteer will have an induction period that will include essential safeguarding information. This programme will include basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record and issues of confidentiality. The induction will also remind staff and volunteers of their responsibility to safeguard all children and young people at our centre and the remit of the role of the Designated Safeguarding Lead (DSL). At induction, all staff will also be provided with a copy of Part One of '*Keeping Children and young people Safe in Education*' (2022) and will be expected to read this.

4.3 In addition to the safeguarding induction, all members of staff will undertake appropriate safeguarding training on a regular basis in accordance with Norfolk Safeguarding Children and young people Board advice.

4.4 All regular visitors and volunteers to our centre 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. (See Appendix 2).

4.5 The DSL, the alternate designated member 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 and young people's Board at least once every three years. In addition to this, the DSL and alternate will attend Designated Safeguarding Lead (DSL) training provided by the Local Authority every two years.

4.6 Our board of directors will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children and young people at our centre.

4.7 All staff will read and understand part 1 and Annex A of the Department for Education's statutory Safeguarding guidance to keep up to date with the most recent local and national safeguarding advice and guidance, '*Keeping Children and young people Safe in Education*' (2022) This provides links to guidance on specific safeguarding issues such as Child Sexual Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via Norfolk Safeguarding Children Partnership at <https://www.norfolklscb.org/> and within the Safeguarding Section of the Norfolk Centres website:

<http://www.centres.norfolk.gov.uk/safeguarding>. The DSL will also provide regular safeguarding updates for staff.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the ACE code of conduct for employees, the role and identity of the designated safeguarding lead (DSL), and the behaviour policy.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation. Appendix 4 of this policy outline in more detail how staff are supported to do this.

## **5. PROCEDURES FOR MANAGING CONCERNS**

5.1 ACE adheres to child protection procedures that have been agreed locally through the Norfolk Safeguarding Children Partnership.

5.2 Every member of staff including volunteers working with children and young people at our centre's 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 outlined in this policy.

5.3 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 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.

5.4 It is *not* the responsibility of centre 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.

5.5 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our centre's. Any member of staff or visitor to a centre 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.

5.6 All concerns about a child or young person should be reported without delay and recorded in writing using the agreed template (see Appendix 1).

5.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

5.8 All referrals will be made in line with Norfolk Children Services procedures as outlined in Appendix 3.

5.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children Services immediately. Anybody can make a referral. 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 CEO. Concerns should always lead to help for the child at some point.

5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children Services, 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.

5.11 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 a member of the Board. If any member of staff does not feel the situation has been

addressed appropriately at this point should contact Children Services directly with their concerns.

## **6. RECORDS AND INFORMATION SHARING**

6.1 If staff are concerned about the welfare or safety of any child at one of our Centres they will record their concern on the agreed reporting form (Appendix 1). They should ensure that the form is signed and dated. Any concerns should be passed to the DSL without delay.

6.2 Any information recorded will be kept in a separate named file, in a secure cabinet 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 centre on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.

6.3 Child protection information will only be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here. All our safeguarding files will include; a chronology, contents front cover and will record significant events in the child's life.

6.4 When a child leaves one of our centres, the DSL will make contact with the DSL at the new centre and will ensure that the child protection file is forwarded to the receiving centre in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving centre and/or evidence of recorded delivery. Where a parent elects to remove their child from the centre roll to home educate, the centre will make arrangements to pass any safeguarding concerns to the Services to Home Educators Team within Norfolk County Council.

## **Confidentiality**

ACE takes confidentiality regarding safeguarding seriously. The CEO and DSL is responsible for ensuring that staff are aware that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is

not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or their alternate). If it is the designated safeguarding lead that is unsure, they should consult the local authority safeguarding team

## **7. WORKING WITH PARENTS & CARERS**

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

7.2 When new students join our centre, parents and carers will be informed that we have a safeguarding policy. Parents/ carers will be asked to confirm by declaration on the student application or referral form that they have been made aware of this policy. A copy will be provided to parents on request and is available on the ACE website. Parents and 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 make a referral to Children Services.

7.3 We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' 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.

7.4 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 a centre has about a child will not prevent the DSL making a referral to Children Services in those circumstances where it is appropriate to do so.

7.5 In order to keep children and young people safe and provide appropriate care for them, the centre requires parents 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 a centre (if different from the above).

ACE will retain this information on the student file. Information about students will only be shared with adults who have parental responsibility for a student or where a parent has given permission and ACE has been supplied with the adult's full details in writing.

## **8. CHILD PROTECTION CONFERENCES**

8.1 Children and young people's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children and young people 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.

8.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the centre in respect of individual children and young people. Usually the person representing ACE at these meetings will be the CEO or 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.

8.3 All reports for child protection conferences will be prepared in advance using the guidance and education report template provided by Children Services. 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 and the child's presentation at centre. In order to complete such reports, all relevant information will be sought from staff working with the child in centre.

8.4 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 Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and young people and our aim is to achieve this in partnership with our parents.

## **9. SAFER RECRUITMENT**

9.1 We will ensure that the Managing Director and at least one member of the Board of Directors have completed appropriate safer recruitment training. At all times they will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children and Young People Safe in Education*', DfE (2022).

9.2 At ACE we will use the recruitment and selection process to deter and reject unsuitable candidates. We require 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, we will undertake Disclosure and Barring Service checks

and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our children and young people.

9.3 We will maintain a Single Central Register of all safer recruitment checks carried out in line with statutory requirements.

## **10. SAFER WORKING PRACTICE**

10.1 All adults who come into contact with our children and young people 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 and young people are competent, confident and safe to do so.

10.2 All staff will be provided with a copy of the ACE code of conduct at induction. They will be expected to know our centre's Code of Conduct and policy 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 Managing Director.

10.3 If staff, visitors, volunteers or parent helpers are working with children and young people 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 in centre, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

10.4 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 and young people. This advice can be found in [Guidance for Safer Working Practice for professionals working in education settings' 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.

10.5 Staff, visitors & volunteers who are working with children and young people will need to sign a declaration to confirm they have read the safeguarding policy and code of conduct.

## **11. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS**

11.1 Our aim is to provide a safe and supportive environment which secures the well being and very best outcomes for the children and young people at our centre's. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

11.2 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 and young people.

11.3 We will take all possible steps to safeguard our children and young people and to ensure that the adults in our centre are safe to work with children and young people. We will always ensure that the procedures outlined in Norfolk Safeguarding Children Board Protocol : Allegations Against Persons who Work with Children and young people

and '*Keeping Children and Young People Safe in Education*', DfE (2022) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO).

11.4 If an allegation is made or information is received about an adult who works in our setting which indicates that they may be unsuitable to work with children and young people, the member of staff receiving the information should inform the Managing Director immediately. Should an allegation be made against the Managing Director, this will be reported to the Chair of the Board. In the event that neither the Managing Director nor Chair of the Board is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Managing Director or the Vice Chair of Board.

11.5 The Managing Director or Chair or Board will seek advice from the LADO within one working day. No member of staff or the board of directors will undertake further investigations before receiving advice from the LADO.

11.6 Any member of staff or volunteer who does not feel confident to raise their concerns with the Managing Director or Chair of Board should contact the LADO directly using the LADO referral form and sending it via email to [LADO@norfolk.gov.uk](mailto:LADO@norfolk.gov.uk).

11.7 ACE 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 ACE, 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.

## **Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

In our ACE we offer extra pastoral support for pupils with SEN and disabilities on a need's basis. This may include, but is not limited to:

- Pastoral mentoring, weekly welfare check ins

## **Pupils with a social worker**

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

## **Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads. We have appointed a designated teacher in who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. This person is Danielle Lindoff and can be contacted on the ACE number.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how to support looked-after children and meet the needs identified in their personal education plans

## 12 RELEVANT POLICIES

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

- Staff Code of Conduct
- Preventing Extremism & Radicalisation Policy
- Anti-Bullying
- Safer Recruitment & Selection
- Whistle-blowing
- Attendance
- E-safety
- Health and Safety including site security
- Harassment and discrimination including racial abuse
- Meeting the needs of students with medical conditions
- First aid
- Educational visits including overnight stays

## 13. STATUTORY FRAMEWORK

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

- 'Working Together to Safeguard Children and young people: A guide to inter-agency working to safeguard and promote the welfare of children and young people', DfE (2022)
- 'Keeping Children Safe in Education', DfE (2022)
- Norfolk Safeguarding Children Partnership procedures
- Norfolk Safeguarding Children Board Protocol : Allegations Against Persons who Work with Children and young people
- Guidance for Safer Working Practice for professionals working in education settings' 2022 DfE (2022)

- 'What to do if you're worried a child is being abused', DfE (March 2015)
- 'Information Sharing: Advice for practitioners', DfE (July 2018)
- 'The Prevent duty: Departmental advice for centres and childcare providers', DfE (2015)

## Appendix 1: Recording Form for Safeguarding Concerns

Staff, volunteers and regular visitors are required to complete this form and pass it to Julia Howard if they have a safeguarding concern about a child in our centre.

Full name of child	Date of Birth	Tutor/Form group	Your name and position in centre

<b>Nature of concern/disclosure</b>	
Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said.	
Was there an injury?    Yes / No	Did you see it?    Yes / No
Describe the injury:	
Have you filled in a body plan to show where the injury is and its approximate size? Yes / No	
Was anyone else with you? Who?	
Has this happened before?	Did you report the previous incident?
Who are you passing this information to? Name:	

Position:

**Your signature:**

**Time:**

**Date:**

Action taken by DSL

Referred to...?

Attendance  
Improvement  
Officer

Police

School Nurse

Children and young  
people's Services

PSA

Guidance  
Adviser

Other

Date:

Time:

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

Pastoral team

Tutor

Child

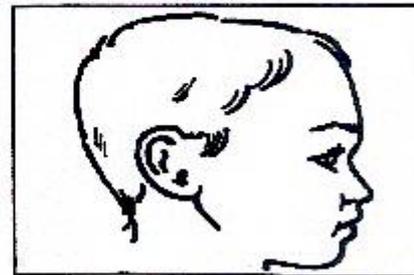
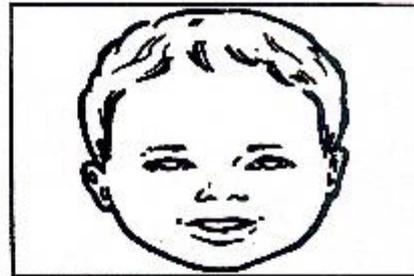
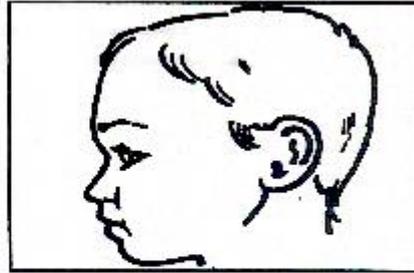
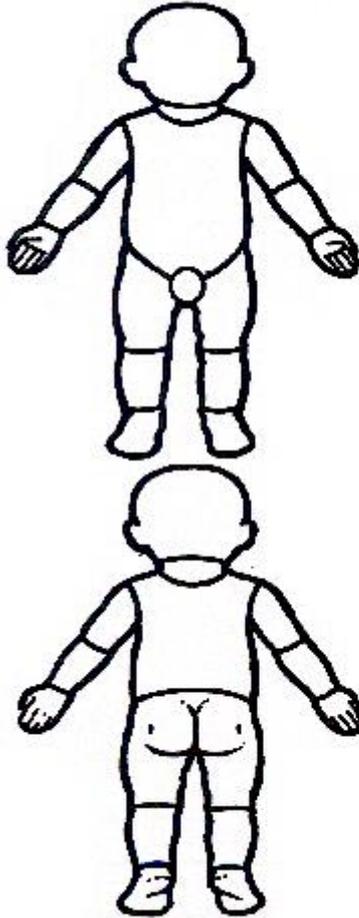
Person who recorded disclosure

Further Action Agreed:

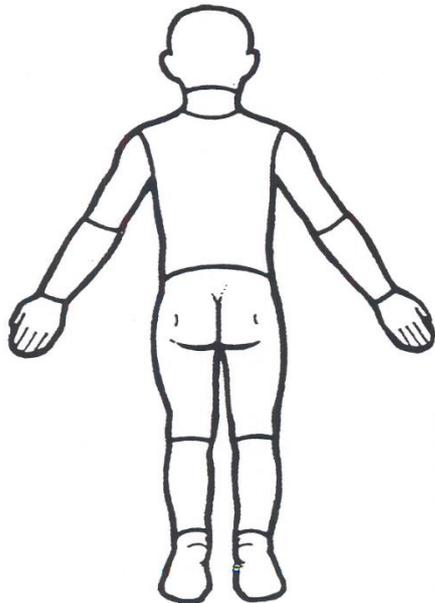
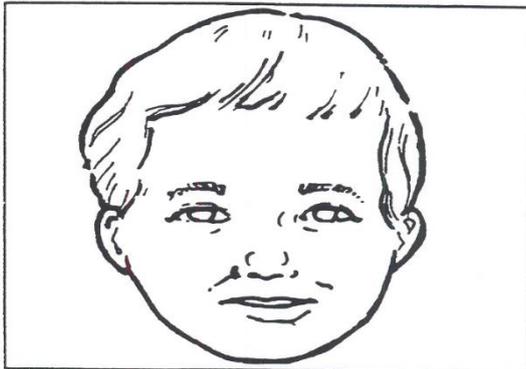
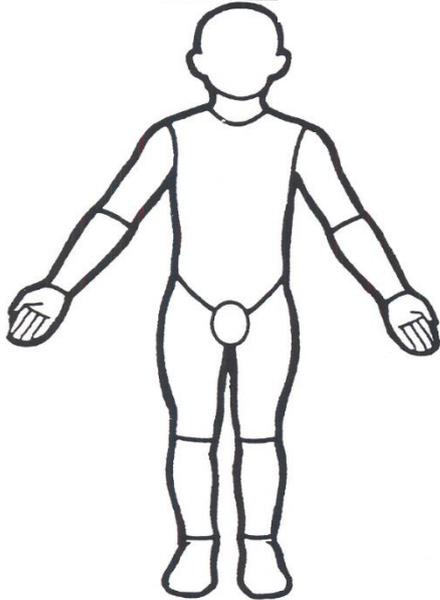
*e.g. Centre to instigate a Family Support Process, assessment by Children and young people's Services*

## Body Map

### Young Child



**Older Child**



**Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.**

We all have a statutory duty to safeguard and promote the welfare of children and young people, and at our centre we take this responsibility seriously.

If you have any concerns about a child or young person in our centre, you must share this information immediately with our Designated Safeguarding Lead (DSL) or one of the alternate post holders.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

**If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated professionals detailed below and provide them with a written record of your concern. A copy of the form to complete is attached to this and others can be obtained from the central office. Please ensure you complete all sections as described.**

**If you are unable to locate them ask a member of the office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.**

Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the Managing Director. If an allegation is made about the Managing Director you should pass this information to the Chair of the Board of Directors. Alternatively, you can contact the Local Authority Designated Officer on 01603 223473.

The people you should talk to in the centre are:

Lauren Gardiner  
Designated Safeguarding Lead (DSL)  
01603 720308

Danielle Lindoff  
Alternate Designated Leads  
01603 720308

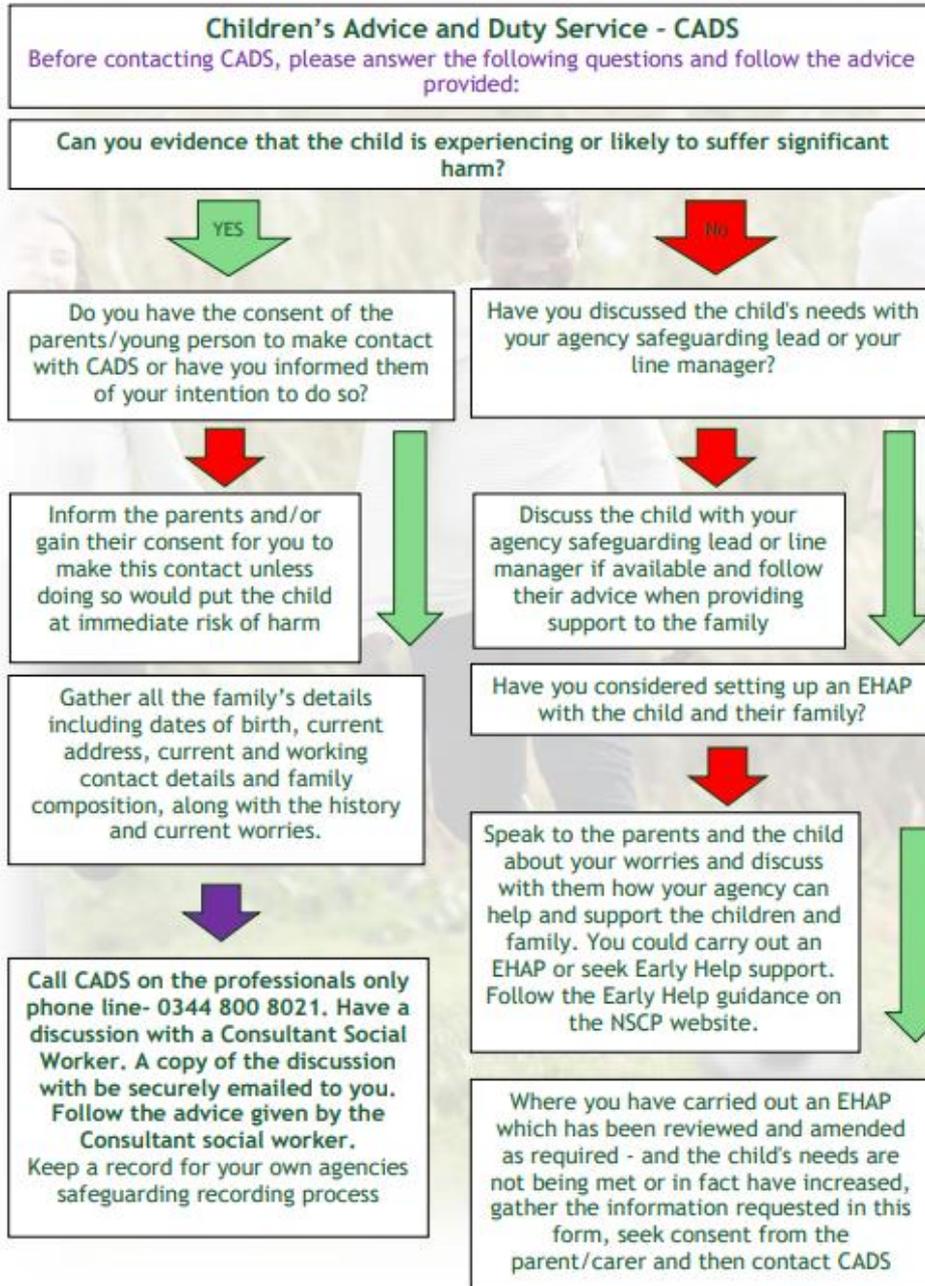
Lou Gardiner  
Chair of Board of Directors  
01603 720308

### **Appendix 3: Local Safeguarding Referral Procedures 2018**

If we have a concern about a child or children we will telephone the Children's Advice and Duty Service (CADS) on **0344 800 8021** immediately. We will be put through to a Social Worker who will take all of the relevant details. We will make sure we are prepared with full details of the child and family, plus what our concerns are, details of any support we have provided to the child/family and what we would like to happen. We will ensure we gain consent from the parent/carer unless to do so would place the child at further risk of harm or undermine a criminal investigation. If we have not sought consent from the parent/carer we will inform the CADS worker of this and the reason for this.

The CADS worker will agree a way forward with us and keep us informed. They will send us a written record of our conversation within 5 working days. The outcomes could include a full referral to the Multi Agency Safeguarding Hub (MASH) for further investigation, the Police, or for work with Early Help. We will not investigate and will be led by the Local Authority and/or the Police.

We will make careful records of all conversations, in ink, including the dates and times of who we spoke to, the information shared and the action agreed. We do not need to send a written referral.



## **Appendix 4: Specific safeguarding issues**

This appendix is based on the advice in annex A of Keeping Children Safe in Education and other recent safeguarding guidance. Annex A also includes information on further issues to be aware of, including children's involvement in the court system, children with family members in prison, and county lines.

**Harmful Sexual Behaviour (HSB)** Harmful Sexual Behaviour is an umbrella term that describes a range of sexual behaviours that are developmentally inappropriate, that may be harmful towards self or others, or be abusive towards another child, young person or adult. This definition applies to online and offline behaviour and includes behaviours such as sexualised, gendered or sexist name calling, sexual image sharing, unwanted sexual touching, sexual assault and rape.

Our approach HSB acknowledges that, regardless of the mitigations put in place, this can happen in our centre and that these behaviours are unacceptable. A forward thinking approach ensures that ACE will not remain complacent about HSBs and take steps to ensure that supportive cultures are established.

Staff will be trained annually to understand the different types of behaviour that form HSBs as well as be provided with guidance on how to respond appropriately if any HSB is witnessed or reported. Staff know that HSBs are serious and that these should never be accepted, tolerated or excused.

If a disclosure of harmful sexual behaviour is reported this will be taken seriously and all appropriate steps up to and including informing the police will be taken to ensure that the victim of this behaviour is kept safe. Where HSB is witnessed, or reported, victims will be listened to and supported. The safeguarding teams within our schools will coordinate support for the victim providing in house support and securing access to support from outside agencies where necessary

Perpetrators of harmful sexual behaviour will be supported to understand what they have done wrong so that these behaviours can be prevented in the future. This does not mean that sanctions will not be put in place or actions by external agencies e.g., the police will not be taken.

## **Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school • Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

## **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions

- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence

The abuse can be perpetrated by males or females, and children or adults. It can be a one off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive

## **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e., we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something

the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Domestic abuse**

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. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or

children arrive at school the following day as part of Operation Encompass. The DSL will provide support according to the child's needs and update records about their circumstances

## Modern Slavery

Modern Slavery and the National Referral Mechanism 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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

## Preventing radicalisation

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

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

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people.
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. ACE have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify students at risk.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at ACE and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alerted to changes in a students' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution •
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Students who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in this policy around recording and information sharing, including discussing their concerns with the DSL. Staff should always act if they are worried.

## **E- safety**

ACE will ensure the safeguarding, protection and education of the students and staff in relation to the acceptable use of technology and communications, including the use of mobile phones and social media. ACE have mechanisms in place to identify, intervene in and escalate any incident where appropriate.

ACE will, where necessary, teach about safeguarding, including online safety. Adaptions will be made for vulnerable children and young people, victims of abuse & SEND students because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable.

Students may often come across harmful and inappropriate material online, and not know how to respond, some of the risk could be;

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint



Therefore ACE will see to provide information and awareness to both Students, staff and parents and carers.

ACE will;

- Ensure the safety and wellbeing of children and young people is paramount when adults, young people or children are using the internet, social media or mobile devices
- Provide staff and volunteers with the overarching principles that guide our approach to online safety
- Ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices, smart devices and mobile phones.

Ace believe that Children and young people should never experience abuse of any kind, should use the internet for education and personal development, but should be safeguarded at all times.