



Action Community Enterprises (ACE)

Safeguarding, Incorporating Child Protection Policy



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Action Community Enterprises CIC

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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 (2025).

All staff receive training on safeguarding procedures at ACE on joining the company. An annual update is provided in September. In addition, all staff are provided with [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education) 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 Board of Directors on an annual basis.

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1. Key Contacts

Name	Role	Email	Telephone
Lou Gardiner	Chief Executive Officer	lou.gardiner@ace-project.org.uk	01603 720308 or 01493 262299
Lauren Gardiner	Safeguarding lead	lauren@ace-project.org.uk	01603 720308 or 01493 262299
Danielle Lindoff	Safeguarding lead	danielle@ace-project.org.uk	01603 720308 or 01493 262299
Children's Advice and Duty Service (CADS) Norfolk County Council Norfolk Community Directory	Single point of contact for raising concerns about a child.	n/a	0344 800 8021
Local Authority Education Duty Desk	Advice where there is a concern about an adult working with a child	n/a	01603 307797
LADO	Making referrals about an adult who may have caused harm to a child, using LADO referral form	LADO@norfolk.gov.uk	n/a

Unregulated alternative provision settings must have due regard to the safeguarding of the children attending the placement.

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

- is on a school roll, contact the DSL at the home school
- is under the remit of the [Alternative Education Service \(Section 19 team\) - Schools \(norfolk.gov.uk\)](#), contact the relevant adviser/key contact
- is in care, and the placement has been commissioned by the [Virtual School for Children in Care and Previously in Care - Schools \(norfolk.gov.uk\)](#), contact the relevant adviser/key contact
- is electively home-educated, contact an adviser within [Home Education - Schools \(norfolk.gov.uk\)](#)

2. PURPOSE & AIMS

2.1 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 to enable children and young people at our centre to have the best outcomes.

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

2.3 Our centres 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 attend our setting. The elements of our policy are prevention, protection and support.

2.4 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.

2.4a Children Missing Education (CME)

In accordance with statutory guidance, any child who has been absent from education for 10 consecutive school days or more without permission must be reported to the Local Authority as a 'Child Missing Education' (CME). This duty applies even if parents/carers have explained the absence. ACE will notify the relevant commissioner and Local Authority in such cases.

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

3. OUR ETHOS

3.1 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. 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.

3.2 We recognise that 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 centres 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.** When concerned about the welfare of a child, staff must always act in the **best interests** of the child.

3.3 At ACE 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.

3.4 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. Our systems are designed to ensure that commissioners, such as the local authority, are informed **without delay** where there is a safeguarding concern. All staff will be trained to recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. At all times we will work in partnership and endeavour to establish effective working relationships with schools, other commissioners, parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children](#) and the [Norfolk Multi Agency Safeguarding Partnership arrangements](#).

3.6 ACE recognises that pupils who may benefit from unregulated AP are often the most vulnerable children. They may have special needs (with or without an Education Health and Care Plan [EHCP]), medical needs, attendance difficulties, challenging behaviour, experienced adverse child experiences and trauma, a social worker, be suspended (after day 6), at risk of permanent exclusion, in care and/or known to supporting agencies such as the Youth Justice Service for example. ACE understands that children attending AP may feel more at ease (than at school/college for example) and therefore make disclosures more readily than in school.

3.7 In relation to Schools Alternative provision, ACE will ensure that **pre-placement**, 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 ACE will be assured

- Pupil-specific risk assessment
- Emergency contact details for the pupil
- Key medical information

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

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

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

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

3.9 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.

3.10 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.

3.11 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 (2023).

4. ROLES AND RESPONSIBILITIES

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

4.1 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

4.2 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.

4.3 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 (2023).
- 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 are adequately trained to carry out safeguarding duties and regularly undertake appropriate updated child protection training.
- ACE CIC will ensure that all staff working directly with children read Part One of KCSIE. Staff not working directly with children may read Annex A, based on role relevance and risk assessment.
- All staff read and sign annually to say they have read and understood Part One of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education).
- procedures are in place for promptly informing schools and commissioners of safeguarding concerns.
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance.
- all staff work in a way that will safeguard and promote the welfare of all children attending the setting.
- All staff maintain timely and detailed records of safeguarding.

- The safeguarding lead has sufficient time to carry out their duties.
- safeguarding records are maintained confidentially and securely.
- sufficient information is provided to visitors on how to report a safeguarding concern (e.g., by providing a leaflet on arrival, or having a poster in reception).
- Safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education' DfE (2024).
- Placement procedures to ACE include detail on when and how safeguarding concerns are reported back to schools and other commissioners. Schools will continue to be responsible for the safeguarding their pupils and should be satisfied that the placement meets the pupil's needs.
- They remedy without delay any weakness regarding our safeguarding arrangements that are brought to their attention.

4.4 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

4.5 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, neglect and exploitation 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)

4.6 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.

4.7 The DSL at ACE will represent our centres 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.

4.8 The DSL will: -

- keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- ensure ~~maintain~~ written records and child protection files ~~ensuring that they are kept confidential and stored securely.~~
- inform schools and commissioners of safeguarding concerns without delay
- maintain accurate safeguarding records
- ensure that safeguarding records are maintained confidentially and securely
- maintain an accurate central log of home school Designated Safeguarding Lead and/or other commissioner contact details

4.9 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 via the online sign in app.

4.10 The DSL is signed up to [Norfolk Schools Ecourier](#) to receive weekly Management Information [MI] sheets.

5. TRAINING & INDUCTION

5.1 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.

5.2 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'* (2024) and will be expected to read this. 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.

5.2a Online Safety Lead

Our Designated Safeguarding Lead (DSL) also has lead responsibility for online safety. This includes ensuring staff and pupils are aware of risks, that filtering and monitoring systems are effective, and that incidents are dealt with appropriately. The DSL may delegate aspects of this work to trained deputies but retains ultimate accountability for online safety.

Four Areas of Online Risk

In line with Keeping Children Safe in Education, staff and pupils are made aware of the four key areas of online risk:

- Content – being exposed to illegal, inappropriate, or harmful content.
- Contact – being subjected to harmful online interaction with other users, including cyberbullying.
- Conduct – personal online behaviour that increases the likelihood of harm or causes harm to others.
- Commerce – financial risks such as online gambling, inappropriate advertising, phishing, and scams. Pupils will be supported to recognise these risks and report any concerns.

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

- all staff undertake appropriate annual safeguarding training, and the proprietor and safeguarding lead(s) will evaluate the impact of this training
- all staff 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
- Mechanisms in place include; a log of all Safeguarding Training (retained as part of the single central record), completion by staff of questionnaires ensuring any new policies/guidance information has been read and understood.

5.4 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).

5.5 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.

5.6 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.

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

5.8 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*' (2023) 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.norfolkscb.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.

5.9 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.

5.10 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, neglect and exploitation, 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.

6. PROCEDURES FOR MANAGING CONCERNS

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

6.2 Every member of staff including volunteers working with children and young people at our centres 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.

6.3 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, neglect and exploitation. 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. The safeguarding lead to pass this information on the home school or other commissioner.

6.4 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 to the commissioners in accordance with the procedures outlined in this policy.

6.5 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our centres. 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.

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

- a clear and comprehensive summary of the concern
- the time and date that the concern was communicated to the home school/commissioner
- details of how the concern was followed up and resolved

- a note of any action taken, decisions reached and the outcome

6.7 Following receipt of any information raising concern, the DSL will pass this on **without delay** to:

- The home school Designated Safeguarding Lead, or;
- Other commissioner, or;
- [Services to Home Educators Team](#) if the child is electively home educated by their parent, or;
- The relevant Norfolk County Council officer if the child is not on the roll of a school, but has been placed by the local authority, for example on an EOTAS¹ package

All information and actions taken, including the reasons for any decisions made, will be fully documented.

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

6.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to [Children's Advice and Duty Service \(CADS\)](#) immediately on **0344 800 8021**. 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.

6.10 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.

6.11 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's Advice and Duty Service \(CADS\)](#) directly with their concerns.

7. RECORDS AND INFORMATION SHARING

7.1 If staff are concerned about the welfare or safety of any child at one of our Centre's 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.

¹ Education other than at school

7.2 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.

7.3 Child protection information will only be kept in the file and this file will be kept up to date. Each concern logged will include:

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

7.4 Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's file whether an electronic or paper system is used. All our safeguarding records will include a chronology and contents front cover.

7.5 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. In the case of schools this will be within 5 days of a placement ending. 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

8. WORKING WITH COMMISSIONERS

8.1 ACE is committed to working in partnership with home schools, commissioners and 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.

8.2 When new students join our centre, home schools, commissioners' 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's Advice and Duty Service \(CADS\)](#).

8.3 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.

8.4 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.

8.5 In order to keep children and young people safe and provide appropriate care for them, the centre requires commissioners and parents/carers 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).

8.6 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.

8.7 ACE will notify the home school or commissioner within 30 minutes of a child's unexplained absence, and escalate concerns in line with local safeguarding procedures and KCSIE 2025.

9. CHILD PROTECTION CONFERENCES

9.1 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.

9.2 The home school/commissioner would normally be the education representative at such meetings. However, 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 DSL or alternative 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 [How to Raise a Concern | Norfolk Safeguarding Children Partnership | PWWC \(norfolkscps.org.uk\)](https://www.norfolkscps.org.uk/How-to-Raise-a-Concern-Norfolk-Safeguarding-Children-Partnership-PWWC). 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 the 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.

10. SAFER RECRUITMENT

10.1 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 broadly in line with the requirements detailed in Part 3 of *'Keeping Children and Young People Safe in Education'*. At least one person involved in conducting an interview will have received safer recruitment training.

10.2 At ACE 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.

10.3 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 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. We understand the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

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

10.5 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.

10.6 As per paragraph 328 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. Appendix 4 (see page 31) provides a sample form for this purpose. Appendix 4 also provides a checklist for the suggested organisation of staff files.

11. SAFER WORKING PRACTICE

11.1 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.

11.2 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.

11.3 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.

11.4 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 is the link to this advice [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.

12. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

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

12.2 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. An allegation may relate to a person who works/volunteers with children who has:

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

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

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

12.5 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 [Allegations Against Persons who Work/Volunteer with Children Policy | NSCP \(norfolklscp.org.uk\)](#) and Part 4 of [Keeping Children Safe in Education](#) are adhered to and will seek appropriate advice. The first point of contact for settings regarding concerns and/or allegation issues is via the **Local Authority Education Duty Desk on 01603 307797**. A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service then the [LADO referral form](#) should be completed. The completed LADO referral form is then sent via email to: LADO@norfolk.gov.uk.

12.6 If an allegation is made or information is received about any adult who works/volunteers in our setting which indicates that they may be unsuitable to work 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.

12.7 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.

12.8 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.

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

12.10 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.

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

12.11 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**. At ACE we recognise a low-level concern to be something which is

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

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

12.13 At ACE staff report all low-level concerns to the DSL. If reported to the safeguarding lead, they will inform the proprietor, who will always be the ultimate decision maker in respect of all low-level concerns

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

12.15 At ACE 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.

12.16 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.

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, neglect and exploitation 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

13 RELEVANT POLICIES

13.1 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
- Behaviour
- Safer Recruitment & Selection
- Whistleblowing
- Attendance
- ESafety
- 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

14. STATUTORY FRAMEWORK

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

- [Allegations Against Persons who Work/Volunteer with Children Policy | NSCP \(norfolkscps.org.uk\)](https://www.norfolkscps.org.uk/policies/allegations-against-persons-who-work-volunteer-with-children-policy/)
- [Alternative Provision - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/alternative-provision)
- [Independent school registration - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/independent-school-registration)
- [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/keeping-children-safe-in-education)
- [Keeping children safe in out-of-school settings: code of practice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/keeping-children-safe-in-out-of-school-settings)
- [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/mandatory-reporting-of-female-genital-mutilation)
- [Policies and Procedures - Norfolk Safeguarding Children Partnership](https://www.gov.uk/government/policies/policies-and-procedures-norfolk-safeguarding-children-partnership)
- [Working together to improve school attendance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/working-together-to-improve-school-attendance)
- [Working Together to Safeguard Children- GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/working-together-to-safeguard-children)

- ['What to do if you're worried a child is being abused'](#), DfE (March 2015)
- ['Information Sharing: Advice for practitioners'](#), DfE (March 2015)
- Prevent duty guidance: for England and Wales (accessible) - GOV.UK (<https://www.gov.uk/government/publications/prevent-duty-guidance>)
- [NSPCC - Safeguarding children with special educational needs and disabilities \(SEND\)](#) and [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#)

Appendix 1: Recording Form for Safeguarding Concerns

Staff, volunteers and regular visitors are required to complete this form and pass it to Lauren Gardiner 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
Home school/commissioner/home-educated (indicate if applicable)			

Nature of concern/disclosure	
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:

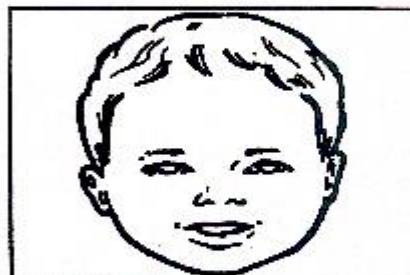
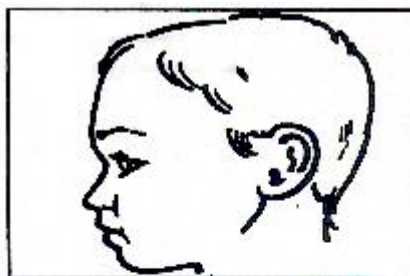
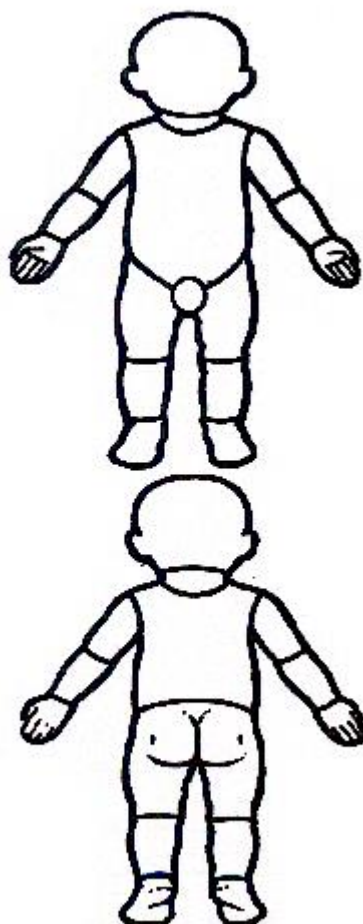
e.g. Centre to instigate a Family Support Process, assessment by Children and young people's Services

Full name:

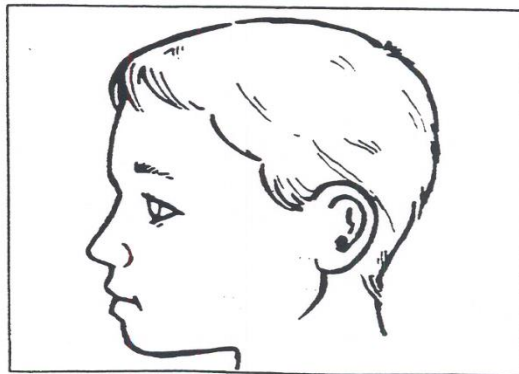
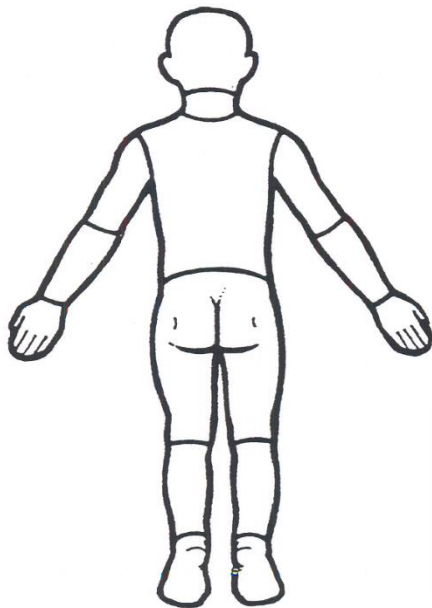
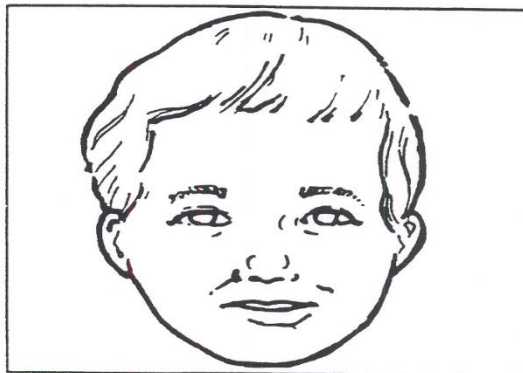
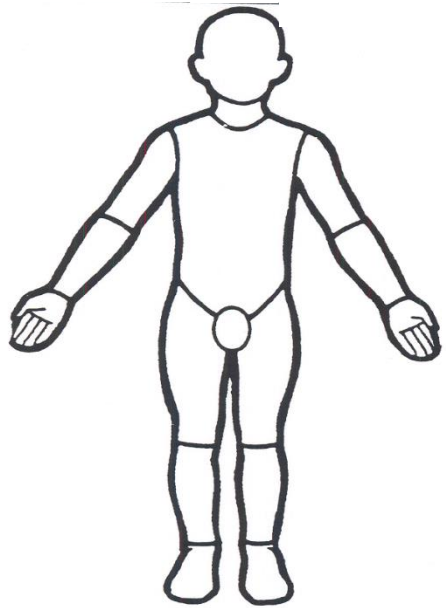
DSL Signature:

Date:

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 or low-level concern 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, the Local Authority Duty Desk on 01603 307797.

[NSPCC whistleblowing helpline](https://www.nspcc.org.uk/help/whistleblowing-helpline/) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

The people you should talk to in the centre are:

Lauren Gardiner
Designated Safeguarding Lead (DSL)
01603 720308

Danielle Lindoff
Millie Allerhand
Alternate Designated Leads
01603 720308

Appendix 3: Local Safeguarding Referral Procedures

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.

Children's Advice and Duty Service [CADS]

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

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

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

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

Upskirting is a criminal offence and is explicitly recognised in Keeping Children Safe in Education. It typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause humiliation, distress, or alarm. At ACE, any incident of upskirting will be treated as a safeguarding matter and responded to in line with our procedures for child-on-child abuse and harmful sexual behaviour.

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.

Contextual safeguarding

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

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

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

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

Child sexual exploitation (CSE)

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.

Child criminal exploitation (CCR); County Lines

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. 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.

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

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

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

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

If a member of staff suspects CCE/County Lines, they will discuss this with the DSL. The home school or other commissioner will be informed immediately. 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 and are well placed

to identify concerns and take action to prevent children from becoming **victims of FGM and other forms of so-called 'honour-based' violence** [HBV] and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV, they should inform the safeguarding lead who will inform the home school or other commissioner immediately.

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

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 fmufco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Note: This preventing radicalisation section remains under review following the publication of a new definition of extremism on the 14 March 2024.

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of ACE's safeguarding approach.

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.

We recognise that safeguarding against **radicalisation and extremism** is no different to safeguarding against any other vulnerability in today's society. We ensure that:

- through training, staff have an understanding of what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise
- there are systems in place for keeping children safe from extremist material when accessing the internet in our setting by using effective filtering and usage policies
- the safeguarding lead will notify the home school or commissioner of any concerns in this area **without delay**
- the safeguarding lead has received Prevent training and will act as the point of contact for any concerns relating to radicalisation and extremism
- the safeguarding lead may make referrals in accordance with [Norfolk Channel Procedures](#) and may represent our setting at Channel meetings as required

Child on child sexual violence and sexual harassment

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

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

We recognise that children are vulnerable to physical, sexual and emotional abuse by other children or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff and volunteers to remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between children; and that consensual and non-consensual sharing of nudes and semi nudes' images and or videos² (also known as sexting or youth produced sexual imagery) is a form of child on child abuse.

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

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 safeguarding lead will notify the home school or other commissioner of any safeguarding concerns in this area **without delay**.

In liaison and with the agreement of the home school Designated Safeguarding Lead or other commissioner, our Designated Safeguarding Lead will work with other agencies including the police and Children's Social Care, as required to respond to concerns about sexual violence and harassment. Where agreed with the home school Designated Safeguarding Lead or other commissioner our Designated Safeguarding Lead will seek consultations where there are concerns

² UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren). Where appropriate, we will share risk assessments and/or advice from the HSB team with the commissioner.

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

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. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature.

The safeguarding lead will notify the home school or other commissioner of any safeguarding concerns in this area **without delay**.

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

- an attendance register is taken at the start of the first session of each day
- attendance (positive attendance, lateness and absences) is reported to the home school/commissioner within 30 minutes of the child's planned arrival
- we hold at least two emergency contact numbers for each of the children who attend our setting wherever possible
- if a child absconds from ACE, the home school/commissioner and parent/carer will be informed immediately.
- staff will alert the safeguarding lead to any concerns raised regarding children who are absent
- children **will not be given permission to leave the AP site** during the session, unless, for example, it is for a pre-arranged appointment or trip
- any absence concerns will be discussed with the commissioner without delay

We monitor unauthorised unexplained absence, 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

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.

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. 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 and 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, they should take immediate action by passing the information on to the safeguarding lead. The safeguarding lead will notify the home school or other commissioner of any safeguarding concerns in this area **without delay**.

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 online and in daily life. We know that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

ACE uses appropriate filtering and monitoring systems to safeguard children online. These systems are reviewed annually and are part of our broader safeguarding strategy, in accordance with KCSIE 2025.

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 online safety training

- Ensure online safety is a running and interrelated theme and is reflected in relevant policies, staff training, the role and responsibilities of the safeguarding lead and any parental engagement
- 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 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.

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.

The safeguarding lead will notify the home school or other commissioner of any safeguarding concerns in this area **without delay**.

Cybercrime

ACE understands 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).

If there are concerns about a student in this area, this must be reported to the Designated Safeguarding Lead, home school or other commissioner **without delay**.

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.

If there are concerns about a child in this area, the safeguarding lead will notify the home school or other commissioner **without delay**.

Children with special educational needs and disabilities or physical health issues

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

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

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

Children who are lesbian, gay, bisexual, trans or questioning their gender [LGBT]

The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, in line with Keeping children safe in education we recognise that children who are LGBT or those perceived by other children to be LGBT (whether they are or not) could potentially be more vulnerable and therefore we work to reduce any additional barriers faced. Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff

in the safe space provided by ACE.

If there are concerns about a child in this area, this must be reported to the Designated Safeguarding Lead **without delay**.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.