Diocese of Norwich Education and Academies Trust

# Safeguarding Policy

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| **Policy Type:** | **Trust Policy** |
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| **Approved By:** | **Trust Board (Joint Policy Development Committee)** |
| **Approval Date:** | **21/07/2025** |
| **Review Date:** | **July 2026** |
| **Person Responsible:** | **Head of Safeguarding** |

- **Never think that you have done enough in terms of creating a safer culture.**
- **Always believe it could happen here.**
- **Keep safeguarding high on everyone's agenda.**
- **Never rely on one process to keep children safe.**

**Our Christian Ethos and Values**
All policies within the Diocese of Norwich Education and Academies Trust (hereafter referred to as "the Trust"), whether relating to an individual academy or the whole Trust, will be written and implemented in line with our Christian ethos and values.

We have high ambition for all, and we truly value the wider educational experience.

We walk and talk our Christian values. We put people at the centre of the organisation and want to see them flourish and grow. Our schools are inclusive, welcoming those of all faiths and none.

**Overall accountabilities and roles**
The Trust has overall accountability for all its academies and staff. Through a Scheme of Delegation it sets out the responsibilities of the Trust, its Executive Officers, the Local Governance Committee and the Principal / Headteacher. The Principal / Headteacher of each academy is responsible for the implementation of all policies of the Trust.
All employees of the Trust are subject to the Trust's policies.

# WHOLE SCHOOL POLICY FOR SAFEGUARDING INCORPORATING CHILD PROTECTION

## The Sandringham Federation
## (hereafter referred to as the school)

**Policy Consultation & Review**

This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

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

The policy is provided to all staff at induction alongside our Staff and Volunteer Code of Conduct, behaviour policy and the safeguarding response to those pupils who are absent from education. In addition, all staff are provided with Part One of the statutory guidance *'Keeping Children Safe in Education'*, DfE (2025).

This policy will be reviewed in full by the Trust and noted by the Local Governance Committee (LGC) on an annual basis. It is due for review by the Trust in July 2026.

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## 1. PURPOSE & AIMS

1.1 The purpose of the Trust safeguarding policy is to ensure every child who is a registered pupil within the Trust is safe and protected from harm. This means we will always work to:

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

1.2 This policy will give clear direction to all staff including supply staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children within our Trust.

1.3 Our Trust fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who are registered pupils at our schools. The elements of our policy are prevention, protection and support.

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

1.5 This policy applies to all pupils, staff, parents, governors, volunteers and visitors.

## 2. OUR ETHOS

2.1 The child's welfare is of paramount importance. Our school will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to talk freely to any member of staff at our school 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.

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

***happen here*' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child.

2.3 The Trust ensures that safeguarding and child protection is at the forefront of all we do and underpins all relevant aspects of process and policy development. The Trust operates with the best interests of the child at its heart.

2.4 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.

2.5 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child, and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose. All staff will be trained to recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

2.6 Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online). The Relationship Education, Relationships and Sex Education and Health Education (delivered in regularly timetabled lessons and reinforced throughout the whole curriculum) will cover relevant topics in an age and stage appropriate way, through a planned, developmental curriculum enabling pupils to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources.

We achieve this by:

**Curriculum Overview**

- Broad and balanced curriculum tailored to meet the needs of all pupils.
- Focus on developing independent, confident, and successful learners.
- Emphasis on high aspirations, responsibility, and community contribution.

**Academic and Personal Development**

- Promotes academic success alongside creativity, problem-solving, resilience, and reliability.
- Physical development, well-being, and outdoor learning are integral.
- Christian Values and cooperative learning embedded in school life.

**Curriculum Design**

- Aligned with the National Curriculum 2014.
- Includes additional experiences tailored to pupils' developmental needs.
- Uses blocked curriculum and topic-themed learning to deepen engagement.
- Child voice is prioritised in planning each unit.

**Community and Heritage**

- Strong ties to the Sandringham Estate and local heritage.
- Enriched learning through community engagement, trips, and visitor interactions.

**Enrichment and Excellence**

- Gold RE and PE Quality Marks achieved.
- Forest School area developed for outdoor learning.
- Access to specialist instructors, musicians, and sports coaches.
- Strong performing arts programme with annual summer production.
- Peripatetic music lessons offered

**Inclusive and Supportive Environment**

- Nurturing atmosphere that fosters enjoyment and love of learning.
- Differentiated support for all learners, including challenge for the most able.
- Targeted interventions ensure individual and group needs are met.

**Impact and Engagement**

- Curriculum enhances collaboration, social skills, and learning outcomes.
- Encourages exploration, personal growth, and positive behaviour.
- Authentic learning contexts through visits and guest interactions.

**Sharing and Celebration**

- Opportunities for children to share learning through open mornings, performances, and competitions.
- Collaborative events with other schools strengthen community ties.

Core aim: to nurture independence, motivation, and responsible citizenship.
Further information can be found in the DfE guidance 'Teaching online safety in school' and 'Relationships Education, Relationships and Sex Education and Health Education'. This education is underpinned by the school's behaviour policy and pastoral support system.

2.7 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) and the Norfolk Multi Agency Safeguarding Partnership arrangements / Suffolk Safeguarding Partnership.

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

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

2.9 The Trust understands the importance of working in a way that adheres to the following legislation:

- The Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty
- Data Protection Act 2018 and UK GDPR

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

## 3. ROLES AND RESPONSIBILITIES

| Role | Name | Contact details |
|---|---|---|
| **Designated Safeguarding Lead (DSL)** | **Catherine King** | **head@swn.dneat.org** |
| **Deputy DSL(s)** | **Nichola Keir**<br>**Tamsin Herbert** | **nichola.keir@flitcham.dneat.org** |
| **Mental Health Lead** | **Catherine King** | **head@swn.dneat.org** |
| **Executive/ Headteacher/Principal** | **Catherine King** | **head@swn.dneat.org** |
| **Safeguarding Link Governor** | **Linda Parker** | **linda.parker@dneat.org** |
| **Chair of Governors** | **Roger Woods** | **roger.wood@swn.dneat.org** |
| **Head of Safeguarding** | **Louise Veeren** | **Tel 01603 550150** |

3.1 It is the responsibility of *every* member of staff, volunteer and regular visitor to our school 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 pupils/students at this school. This includes the responsibility to provide a safe environment in which children can learn.

**Governing Board**

3.2 The governing board of the school is the Trust Board and they are accountable for ensuring the effectiveness of this policy and our compliance with it. The governing board delegates some responsibilities as defined in the Scheme of Delegation. The governing board takes collective responsibility to safeguard and promote the welfare of our pupils. Each Local Governance Committee has a named Safeguarding Link Governor who champions safeguarding within the school. Our Safeguarding Link Governor is: Linda Parker

3.3 The governing board will ensure that:

- The safeguarding policy is updated and approved annually, is available publicly via our school website and has been written in line with The Trust/Local Authority guidance;
- The school 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 at least one deputy DSL(s) who is an 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 and the role will be evidenced explicitly in the role holders job description;
- All staff receive a safeguarding induction and are provided with a copy of this policy, the Trust Staff and Volunteer Code of Conduct, the Behaviour Policy and the school's safeguarding response for those pupils/students who are absent from education as detailed in Section 6 of this policy;

- All staff undertake appropriate child protection training that is updated annually (with regular updates as necessary) and on-line safety training;
- In terms of filtering and monitoring there is consideration to the number of and age range of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks;
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance; Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'* DfE (2025);
- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.
- They ensure regular monitoring of the Single Central Record (SCR) including enhanced checks for governors, and an annual self-assessment review of safeguarding across the Trust.

3.4 The governing board and Local Governance Committee will receive a safeguarding report at each meeting. These reports include training that has taken place, the number of staff attending and any outstanding training requirements. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils.

**The Headteacher/Principal**

3.5 At the school the Headteacher/Principal is responsible for:

- Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL).
- Identifying alternate members of staff to act as the Designated Safeguarding Lead (DSL) in his/her absence to ensure there is always cover for the role.
- Ensuring that all Trust and school policies and procedures particularly concerning referrals of cases of suspected abuse, neglect and exploitation are followed by all staff;
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures (Speak Up Policy) including raising awareness of NSPCC Whistle-blowing helpline 0800 028 0285;
- Liaise with the LADO and the Trust in the event of an allegation of abuse being made against a member of staff or volunteer.

**The Designated Safeguarding Lead (DSL)**

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

3.7 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 on CPOMS (the Trust's online safeguarding reporting system) and given to the DSL.

3.8 During term time the DSL or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. If in exceptional circumstances a DSL is not available on the school site in person, the school must inform the Trust Head of Safeguarding, and also ensure the DSL is available via telephone and/or any other relevant media.

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

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

3.11 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained in line with statutory guidance.

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

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

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

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

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

**4. TRAINING & INDUCTION**

4.1 When new staff join our school they will be informed of the safeguarding arrangements in place. They will be given a copy of the Safeguarding Policy along with the Trust Staff and Volunteer Code of Conduct, Part One and Annex A of *"Keeping Children Safe in Education"* and told who our Designated Safeguarding Lead (DSL), Deputy DSL and the Trust Safeguarding Lead is. They will also receive a copy of the Behaviour Policy and the school's response to children who are absent from education, this information is provided in Section 6 of this policy. All staff are expected to read these key documents. They will be provided with training from the Designated Safeguarding Lead about how to record and report safeguarding concerns using CPOMS.

4.2 Every new member of staff or volunteer (for governors see 4.6) will receive safeguarding training during their induction period within one week of joining the school. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Lead (DSL). The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive online safety training, including understanding the expectations, applicable roles, and responsibilities in relation to filtering and monitoring as this is part of the overarching safeguarding approach of our school.

4.3 In addition to the safeguarding induction, we will ensure that the mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of "*Keeping Children Safe in Education"*.
In order to achieve this we will ensure that:

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

4.4 All visitors, temporary staff and volunteers to our school 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). These procedures are available via a leaflet or via an electronic form upon sign in.

4.5 The DSL, the alternate designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection will attend appropriate training in accordance with their role, this may include but not exclusive to; attending multi-agency training courses organised by the local authority, NSPCC training, CEOP training or any other training deemed to meet the contextual safeguarding needs of the sch. The DSL and alternate will attend Designated Safeguarding Lead (DSL) training two

years. In addition to formal training the DSL will ensure that they update their knowledge and skills at regular intervals and demonstrate annually to keep up with developments relevant to their role. CPD files with records of attendance, cluster meetings, Local Safeguarding Children's Groups, personal development, e- courier and the Trust e-newsletter updates should be kept in a CPD file available for inspection during the Trust Safeguarding Audit/LA safeguarding audits.

4.6 Our Local Governance Committee will also undertake appropriate training to equip them with knowledge of the Trust Safeguarding procedures, information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Lead (DSL). The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. This training takes place at induction and is updated regularly.
Training for all Governors to support them in their safeguarding role is available through GovernorHub as an online course or live training provided by the Trust Head of Safeguarding.

4.7 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance. Annex B of '*Keeping Children Safe in Education*' (2025) 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 and the Suffolk Safeguarding Partnership and also within the Safeguarding Section of the Norfolk Schools website.

**5. PROCEDURES FOR MANAGING CONCERNS**

5.1 The school adheres to child protection procedures that have been agreed locally through the Norfolk Children's Safeguarding Partnership (NSCB) and through Suffolk Safeguarding Partnership. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with Norfolk Local Assessment Protocol, the Norfolk Continuum of Need Guidance and the Suffolk Threshold Matrix.

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

5.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

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

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

5.6 All concerns about a child or young person should be reported without delay and recorded using the Trust approved online reporting system of CPOMS. Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

5.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the Norfolk Children's Advice and Duty Service (CADS) 0344 800 8021team or the Suffolk Multi-Agency Safeguarding Hub (MASH) on 0345 606 14 99. All information and actions taken, including the reasons for any decisions made, will be fully documented.

5.8 All referrals will be made in line with Norfolk CADS procedures/ Suffolk MASH as outlined in Appendix 3.

5.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Norfolk CADS or Suffolk MASH immediately. Anybody can make a referral in these circumstances. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Headteacher/Principal. Concerns should always lead to help for the child at some point.

5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with CADS, Suffolk MASH the Trust Head of Safeguarding or the police if:

- the situation is an emergency and the designated senior person, their alternate and the Headteacher/Principal are all unavailable.
- they are convinced that a direct report is the only way to ensure the pupil's safety.
- the concern relates to the Headteacher/Principal of the school. This should be raised with the DSL (unless the DSL is the Headteacher/Principal, in which case contact must be made with the LADO and the Trust Head of Safeguarding).

5.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy

should raise their concerns with the Headteacher/Principal. If any member of staff does not feel the situation has been addressed appropriately by the Headteacher/Principal, they should contact the Trust Head of Safeguarding/Norfolk CADS /Suffolk MASH directly with their concerns.

## 6. SPECIFIC SAFEGUARDING ISSUES

### Contextualised safeguarding

6.1 The Trust recognises that safeguarding incidents and/or behaviours can be associated with factors outside of the school environment and/or can occur between children outside of school. This is known as contextual safeguarding. It is key that all staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse 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 so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing and signs.
- Communication barriers and difficulties in overcoming these barriers.

6.3 The Trust recognises that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): County Lines and Serious Violence

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

6.5 We understand that Child Sexual Exploitation is a form of child sexual abuse, and this imbalance of power coerces, manipulates, or deceives a child or young person into sexual

activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. Child sexual exploitation does not always include physical contact, it can also occur through the use of technology. We understand that some children may not realise they are being exploited e.g. they may believe they are in a genuine romantic relationship.

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

6.7 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 risk of sexual exploitation.

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

6.9 If a child is suspected to be at risk of or involved in county lines, a referral to the Norfolk Children's Advice and Duty Service (CADS) or Suffolk Multi-Agency Safeguarding Hub (MASH) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

**So-called "honour-based" abuse (including Female Genital Mutilation and Forced Marriage**

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

6.11 Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure

by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: Mandatory Reporting of Female Genital Mutilation- procedural information Home Office (January 2020)

6.12 We recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. The Forced Marriage Unit has statutory guidance and Multi-agency guidelines and can be contacted for advice or more information: Contact 020 7008 0151 or email fmu@fco.gov.uk

**Preventing radicalisation and extremism**

6.13 The Trust recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. The Trust will ensure that:

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

**Child on Child sexual violence and sexual harassment**

6.14 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); and
- initiation/hazing type violence and rituals

6.15 We recognise that children are vulnerable to physical, sexual, and emotional abuse by their peers 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 peers; and that consensual and non-consensual sharing of nudes and semi nudes' images and/or videos (also known as sexting or youth produced sexual imagery) is a form of child-on-child abuse. (See UKCIS guidance Sharing nudes and semi nudes advice for education settings)

6.16 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 it is not reported. We recognise that pupils 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. In some cases, the victim may not make a direct report, and this may come from a friend of a conversation that is overhead. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children's procedures will apply in respect of any child who is suffering or like to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child-on-child abuse; 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.

6.17 At the school 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.

6.18 At the school 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.

6.19 All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child-on-child abuse. The DSL will respond to any concerns related to child-on-child abuse in line with guidance outlined in Part five of '*Keeping Children Safe in Education*.' We will ensure that all concerns, discussions, and decisions reached are clearly recorded and any identified actions are followed up.

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

6.21 Support will depend on the circumstances of each case and the needs of the child, it may include completion of risk assessments to support children to remain in school whilst safeguarding other children and the victim, delivery of early intervention in respect of HSB and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) or in Suffolk to The Ferns- Suffolk where a pupil discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. To access support from the Harbour Centre, the assault does not have to have taken place in Norfolk, but the victim must live in Norfolk. The Harbour Centre 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. The Ferns – Suffolk has a 24/7 helpline 0300 123 5058 if pupils or staff need to speak to a Crisis Worker for help & advice. The DSL will always contact the police in cases of rape and serious sexual assault as per the guidance When to call the Police: a guide for schools and colleges, National Police Chiefs Council.

**Modern Slavery**

6.22 The Trust understands that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance Modern Slavery: how to identify and support victims for concerns of this nature.

**Safeguarding responses to children who are absent from education.**

6.23 The Trust adheres to the 'Working Together to Improve School Attendance' (2024) guidance. All staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

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

- An attendance register is taken at the start of the first session of each school day and once during the second session.
- We make every effort to contact parents and carers and follow up with the emergency contacts held.
- We hold at least two emergency contact numbers for each of the pupils on our roll wherever possible.
- Staff will alert DSLs to any concerns raised regarding children who are absent from school.
- The DSLs will meet regularly with the Attendance Lead, SENCo and other members of the pastoral team to ensure that each response is thorough and considers all the relevant information about individual children.
- We will follow the procedures outlined in our attendance policy including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- We understand we remain responsible for the safeguarding of all pupils who are placed in an alternative provision.

- When removing a child from roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files.
- The school will respond to children who are absent from education by conducting home visits, referral to pastoral support within the school, attendance panel meetings with parents and carers.

**Mental Health**

6.25 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.

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

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

**Online safety**

6.28 All staff in the Trust are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse their peers 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.

6.29 As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered. We will ensure that online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

6.30 The school has filtering and monitoring systems provided by Rydal which provides filtering systems and monitoring of internet searches alerts through Smoothwall. In addition to this, monitoring systems are provided by SENSO who provide an assisted alerting system for types of keyboard activity. This is compliant with the DfE filtering and monitoring standards. More details can be found in our policies on ICT and Internet Acceptable Use Policy which considers the 4Cs, content, contact, conduct and commerce and reflect the fact

that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G).

6.31 At the school we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out reviews of our approach to online safety that considers and reflects the risks that children face in our setting. We also communicate with parents and carers to reinforce the importance of children being safe online.

**Cybercrime**

6.32 We understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). We are aware of the Cyber security standards for schools and colleges.GOV.UK and the guidance from the National Education Network.

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

**Domestic Abuse**

6.34 All staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. We understand that children can be victims of domestic abuse. Where they see, hear or experience the effects this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. We are aware of the Norfolk Integrated Domestic Abuse Service (NIDAS) and signpost victims to the service. There is Suffolk support information available Domestic Abuse and Sexual Violence and Norfolk and Suffolk Victim Care are available to offer support where threshold for NIDAS support has not been met.

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

6.35 The Trust recognises that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as:

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

6.36 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.

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

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

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

**7. RECORDS AND INFORMATION SHARING**

7.1 If staff are concerned about the welfare or safety of any child at our school, they will record their concern either on the online safeguarding system or if this is not available due to IT issues then on the agreed reporting form. Any concerns should be passed to the DSL without delay. The Trust approved online reporting system used in this school is CPOMS. All staff must use the setting's electronic system and not a paper-based recording if the electronic system is available. Any information recorded on paper will be kept in a separate named file, in a secure cabinet and not with the child's academic file or electronically. These files will be the responsibility of the DSL.

7.2 Child protection information will only be shared within school 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 be kept up to date. Each concern logged will include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.

At the school we will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This includes instances where referrals were or were not made to another agency such as the Children's Advice and Duty Service (Norfolk) Multi Agency Safeguarding Hub (Suffolk) or the Prevent programme. Invitations to child protection conferences, core groups and all other multi-agency meetings and minutes taken at these will be stored on the child's file on CPOMS. All our safeguarding records will record significant events in the child's life.

7.4 When a child leaves our school (including in year transfers) the DSL will contact the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school. This will be within 5 days for an in-year transfer or within the first 5 days of the start

of a new term. We recognise that not providing information as per the timescales can impact on the child's safety, welfare and educational outcomes.

7.5 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 school and/or evidence of recorded delivery or secure e-file transfer.

7.6 Prior to a child leaving we will consider if it would be appropriate to share any additional information with the new school or college in advance to help them put in place the right support to safeguard this child.

7.7 Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding concerns to the Services to Home Educators Team within Norfolk County Council.

**8. WORKING WITH PARENTS & CARERS**

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

8.2 When new pupils join our school, parents and carers will be informed that we have a Safeguarding Policy. A copy will be provided to parents on request and is available on the school 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 contact Norfolk Children's Advice & Duty Service (CADS) or the Suffolk Multi Agency Safeguarding Hub (MASH).

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 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 the school has about a child will not prevent the DSL making a referral to Norfolk CADS/ Suffolk MASH in those circumstances where it is appropriate to do so.

8.5 In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above).
- Full details of any other adult authorised by the parent to collect the child from the school (if different from the above).

The school will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the adult's full details in writing.

8.6 At the school we are working in partnership with Norfolk and Suffolk Constabulary and Norfolk and Suffolk Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. To achieve this, Norfolk Children's Advice & Duty Service and Suffolk Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of pupils has been present or experienced a missing episode with the Designated Safeguarding Leads. On receipt of any information, the DSL will decide on the appropriate support the child requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with the Norfolk Operation Encompass Protocol and Suffolk Operation Encompass. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

**9. CHILD PROTECTION CONFERENCES**

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

9.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the school in respect of individual children. Usually, the person representing the school at these meetings will be the Headteacher/Principal or DSL. In any event, the person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.

9.3 All reports for child protection conferences will be prepared in advance using the guidance and template report provided by the Norfolk Safeguarding Children Partnership and Suffolk Safeguarding Partnership Child Protection Information. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional, and intellectual development, the child's presentation at school and information about school attendance. To complete such reports, all relevant information will be sought from staff working with the child in school.

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

**10. SAFER RECRUITMENT**

10.1 At all times the Trust will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE (2025). At least one person involved in conducting an interview will have received safer recruitment training.

10.2 The Trust 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.

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

10.5 We will undertake Disclosure and Barring Service (DBS) checks, and other pre-employment checks as outlined in *'Keeping Children Safe in Education'* to ensure we are recruiting and selecting the most suitable people to work with our children.

10.6 We will maintain a Single Central Record (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff will check the SCR each half term to ensure that it meets statutory requirements.

10.7 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.

**11. SAFER WORKING PRACTICE**

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

11.2 All staff will be provided with a copy of the Staff and Volunteer Code of Conduct at induction. They will be expected to know our Staff and Volunteer 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 who have accessed Norfolk Steps (a BILD accredited programme) will be kept by the Headteacher/Principal.

11.3 If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in the school, 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. This advice can be found in '*Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings', (February 2022)* All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

**12. MANAGING ALLEGATIONS AGAINST AND LOW-LEVEL CONCERNS RELATING TO STAFF & VOLUNTEERS**

**Allegations that may meet the harms threshold.**

12.1 Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made, suitability or transferrable risk. Where a person undertaking work for, in or on behalf of the Trust becomes aware of a potential allegation or low-level concern in accordance with the guidance below, they must immediately refer to the Trust's 'Statement of procedures for dealing with allegations made against / low-level concerns raised in relation to staff, including supply teachers, volunteers and contractors.' The Statement details the actions that must and must not be taken and contains a form to use to record the details of the allegation or concern and the response.

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. We work to the thresholds for harm as set out in 'Working Together to Safeguard Children' (2023) and 'Keeping Children Safe in Education', DfE (2025) below. An allegation may relate to a person who works / volunteers with children who has:

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

The 4th bullet point above recognises circumstances where a member of staff (including supply teachers) or volunteer is involved in an incident outside of school/college which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

12.3 At the school 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 the school to the LADO service directly at lado@norfolk.gov.uk; LADO@suffolk.gov.uk;

These are adults such as those in the voluntary sector, taxi drivers, escorts, and fosters carers.

12.4 We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We will always ensure that the procedures outlined in the local protocol *: Allegations Against Persons who Work with Children* (Norfolk) / Allegations Against People in a Position of Trust (Suffolk)and Part 4 of *'Keeping Children Safe in Education'*, DfE (2025) are adhered to and will seek appropriate advice. The first point of contact for schools regarding concerns and/ or allegation issues (including for supply teachers) in Norfolk is via the Local Authority Duty Desk on 01603 307797. A Duty Adviser (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service, then the LADO referral form should be completed. The completed LADO referral form is then sent via e-mail to LADO@norfolk.gov.uk .
Suffolk LADO central telephone number is 0300 123 2044. Details for making a referral and initial consideration can be found here Suffolk LADO A form can be requested via an email to LADO@suffolk.gov.uk

12.5 If an allegation is made or information is received about *any* adult who works/volunteers in our setting which indicates that they may be unsuitable to work/volunteer with children, the member of staff receiving the information should inform the Headteacher/Principal immediately. This includes concerns relating to agency and supply staff and volunteers. If the Headteacher/Principal is not contactable on that day, the information must be passed to and dealt with by the member of staff acting as Headteacher/Principal.
If the allegation made or the information received is about the Headteacher/Principal, this should be reported to the CEO/ Head of Safeguarding.

12.6 The Headteacher/Principal or Trust Head of Safeguarding will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

12.7 When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the Trust is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the Trust will usually take the lead in conducting an investigation as we have direct access to any affected children and other school staff to collect the facts.

12.8 Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher/Principal or Trust Safeguarding Lead should contact the LADO directly via email to lado@norfolk.gov.uk / lado@suffolk.gov.uk

12.9 Further information and guidance documents relating 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 Norfolk and on the Suffolk Safeguarding Partnership Suffolk. 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 The Trust 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 Trust Head of Safeguarding will report these cases on the behalf of the school. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, 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 Team. The Trust must also consider whether to refer the case to the Secretary of State (via the Teacher Regulation Agency and the Trust Head of Safeguarding will report this on behalf of the school), if a 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.

**Concerns that do not meet the harm threshold**
12.11 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. In Suffolk contact the LADO central telephone number 0300 123 2044. The Trust recognise a low-level concern to be something which is:

- inconsistent with the Staff and Volunteer 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 The Trust promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the Trust (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. Through training, staff are made aware of what low level concerns are and understand the importance of reporting these types of concerns in writing.

12.13 At the school staff report all low-level concerns to the Headteacher/Principal. If reported to the DSL then the DSL will inform the Headteacher/Principal of the concern in a timely fashion. The Headteacher/Principal 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 the expected professional standards.

12.15 The Trust understands 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 (Norfolk) and 0300 123 2044 (Suffolk). 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.

**13. USE OF PREMISES FOR NON SCHOOL ACTIVITIES**

13.1 Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements as per the DfE guidance After-school clubs, community activities and tuition: safeguarding guidance for providers are in place to keep children safe.

13.2 We will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). Safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

13.3 If an allegation is made relating to an incident that happened when an individual or organisation was using school premises for non-school/college activities, we will follow the safeguarding policies and procedures, included in section 12 above.

**14. RELEVANT POLICIES**

14.1 To underpin the values and ethos of our Trust and our intent to ensure that pupils at our schools are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff and Volunteer Code of Conduct
- Anti-Bullying Policy (Pupils and Students)
- Behaviour Policy
- Recruitment and Selection Policy
- Speak Up Policy *(fulfils requirement to have clear whistleblowing procedures in place)*
- Attendance
- ICT and Internet Acceptable Use Policy
- Health and Safety Policy
- Equality and Diversity Statutory Duties and Objectives

- Supporting Pupils with Medical Conditions
- Intimate Care Policy
- Educational visits including overnight stays
- Relationships, Sex and Health Education (RSHE) Policy
- Staff Induction Policy
- Volunteer Policy
- Statement of procedures for dealing with allegations made against / low-level concerns raised in relation to staff, including supply teachers, volunteers and contractors
- Lettings Policy
- Recruitment of Ex-Offenders Policy Statement

**15. STATUTORY FRAMEWORK**

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

1. Working Together to Safeguard Children DfE (December 2023)
2. Keeping Children Safe in Education DfE (2025)
3. Working Together to Improve School Attendance DfE (2024)
4. Norfolk Safeguarding Children Partnership procedures
5. Norfolk Safeguarding Children Partnership Protocol: Allegations Against Persons Who Work with Children
6. Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (Feb 2022)
7. What to do if you're worried a child is being abused DfE (March 2015)
8. Information sharing: advice for practitioners providing safeguarding services DfE (May 2024)
9. The Prevent duty: Departmental advice for schools and childcare providers DfE (September 2023)
10. The Prevent duty: safeguarding learners vulnerable to radicalisation (September 2023)
11. Mandatory Reporting of Female Genital Mutilation- procedural information Home Office (January 2020)
12. Multi-agency practice principles for responding to child exploitation and extra-familial harm
13. Child sexual exploitation: guide for practitioners DfE (February 2017)
14. Teaching online safety in school DfE (January 2023)
15. Mental Health and Behaviour in Schools DfE (November 2018)
16. Data protection: toolkit for schools DfE (June 2025)
17. Promoting the education of children with a social worker DfE (March 2024)
18. Preventing youth violence and gang involvement
19. Criminal exploitation of children and vulnerable adults: county lines
20. Relationships Education, Relationships and Sex Education (RSE) and Health Education
21. Domestic Abuse Act 2021 Statutory Guidance (Home Office April 2023)

**Appendix 1: Draft Recording Form for Safeguarding Concerns if the online system is unavailable (NB online reporting should be used)**

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

| Full name of child | Date of Birth | Class/Tutor/Form group | Your name and position in school |
|---|---|---|---|
| | | | |

## 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.

Time & date of incident:

Who are you passing this information to?
Name:

Position:

**[Ensure that if there is an injury this is recorded (size and shape) and a body map is completed]**
**[Make it clear if you have a raised a concern about a similar issue previously]**

**Your signature:**
**Time form completed:**
**Date:**

Time form received by DSL:

Action taken by DSL:

Referred to…?

| Attendance Lead | Police | Just One Number | CADS | PSA | Community/Partner | Other |
|---|---|---|---|---|---|---|
| ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ Other |

Date: Time:

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

Feedback given to…?

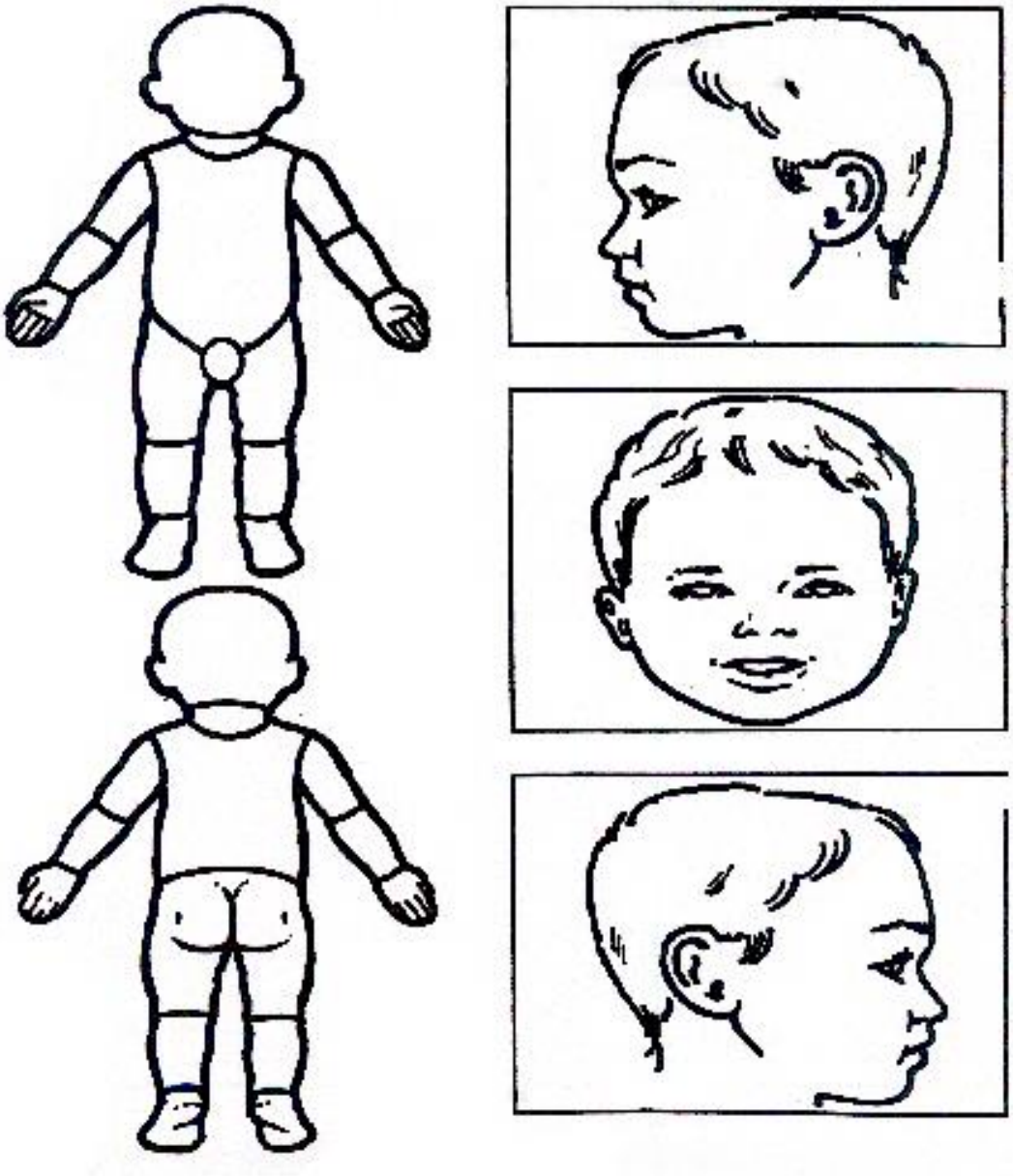
| Pastoral team | Teacher | Child | Person who recorded disclosure |
|---|---|---|---|
| ☐ | ☐ | ☐ | ☐ |

Further Action Agreed:
*e.g. Academy to instigate a Early Help Assessment Plan , assessment by Childrens Services*

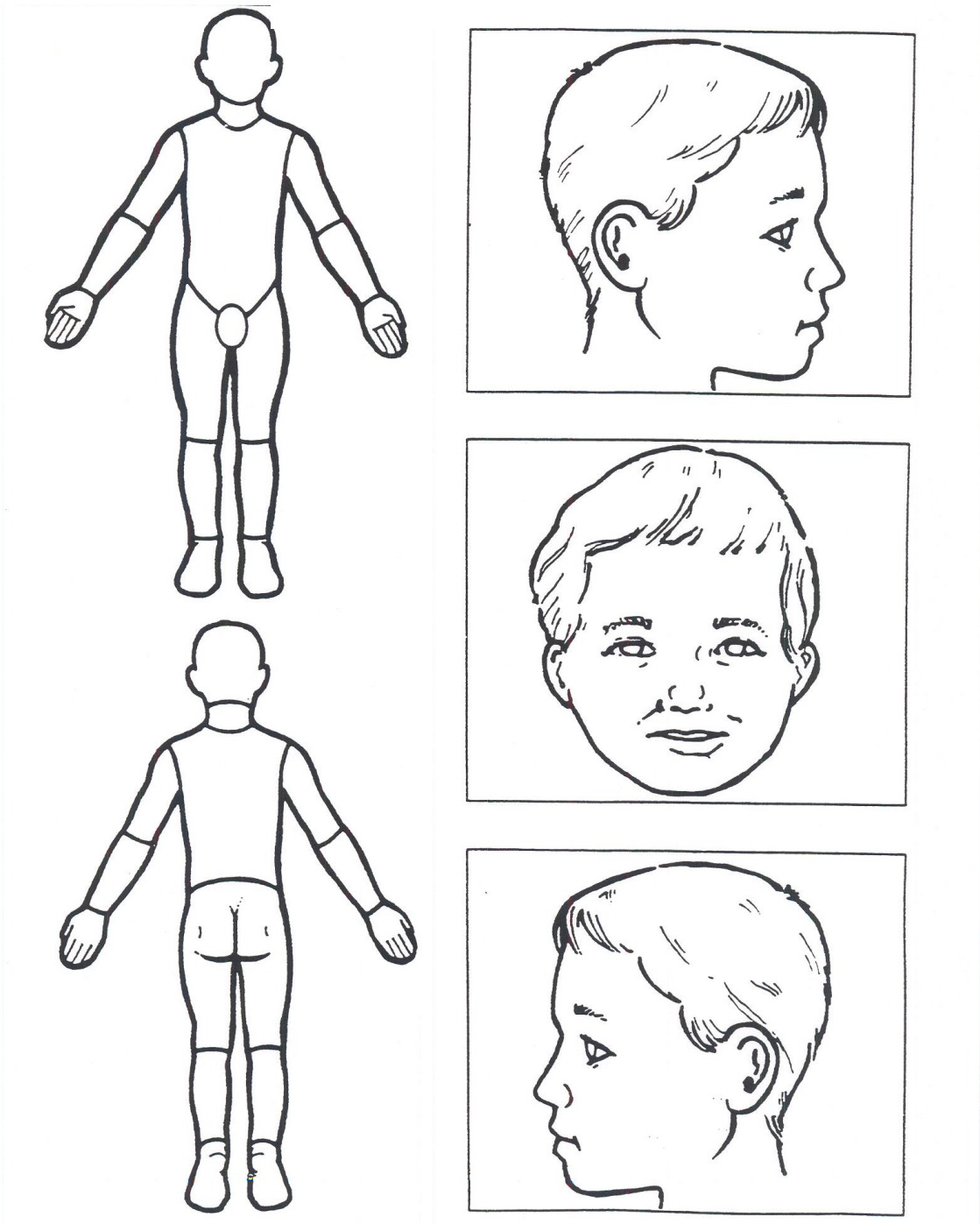
Full name:
DSL Signature:
Date:

**Indicate clearly where the injury was seen and attach this to the Recording Form (use body mapping on online recording system)**

Young Child



**Older Child**



**Indicate clearly where the injury was seen and attach this to the Recording**

**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 at our academy we take this responsibility seriously.

If you have any concerns about a child or young person in our academy, 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 safeguarding leads 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 school office. Please ensure you complete all sections as described.**

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

Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the Headteacher/Principal. If an allegation is made about the Headteacher/Principal you should pass this information to the Trust Head of Safeguarding on 01603 550150

Alternatively, you can contact the Local Authority Duty Desk on 01603 307797 (Norfolk) and 0300 123 2044 (Suffolk). 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**.**
The people you should talk to in the academy are:
Designated Safeguarding Lead (DSL):
Location of office:
Contact Number:

Deputy Designated Lead:
Location of office:
Contact Number:

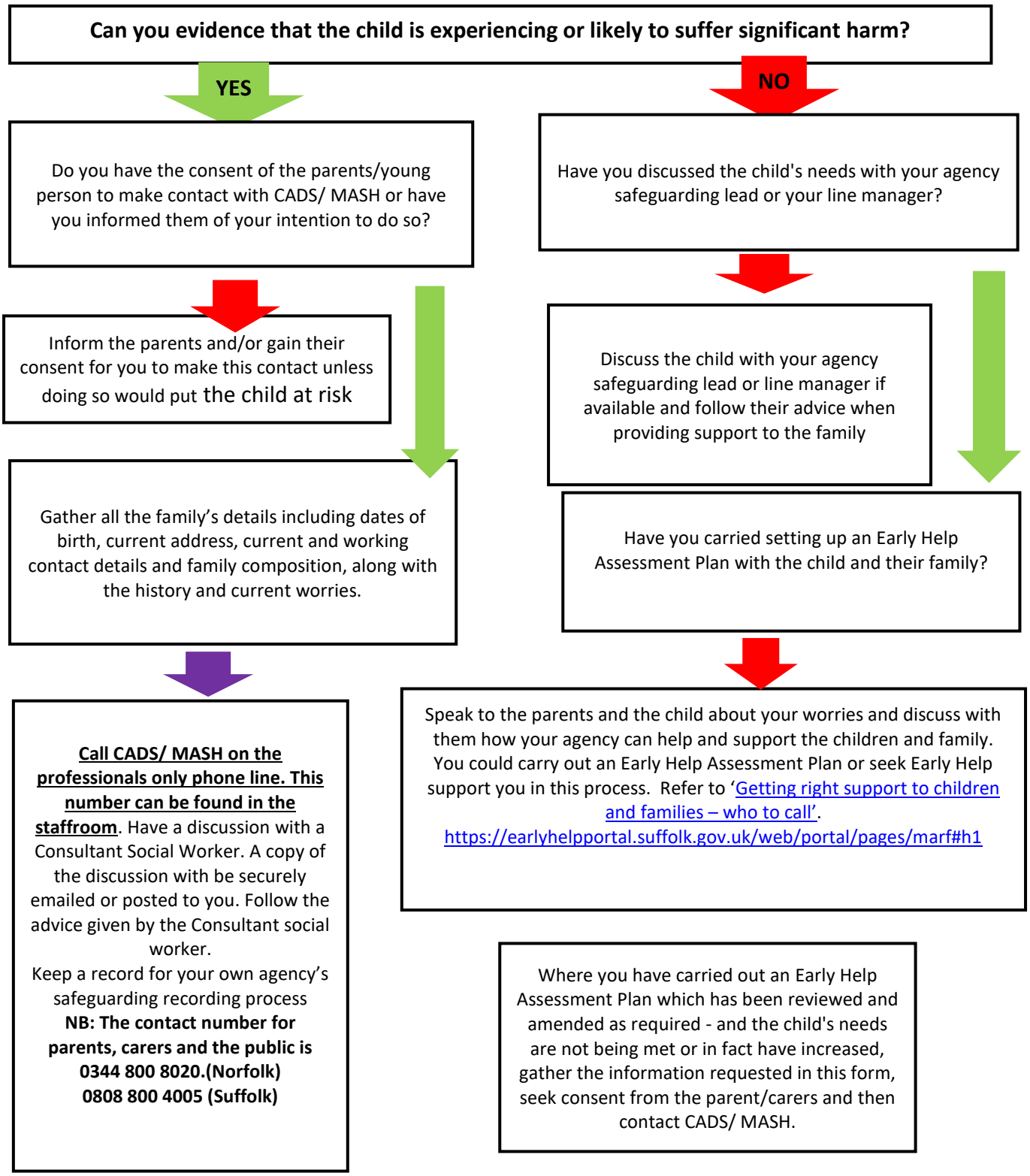
Trust Head of Safeguarding: Louise Veeren
Location of Office: Orchard House, East Tuddenham, Norwich
Contact Number: 01603 550150

**We strive to safeguard and promote the welfare of all of our children.**

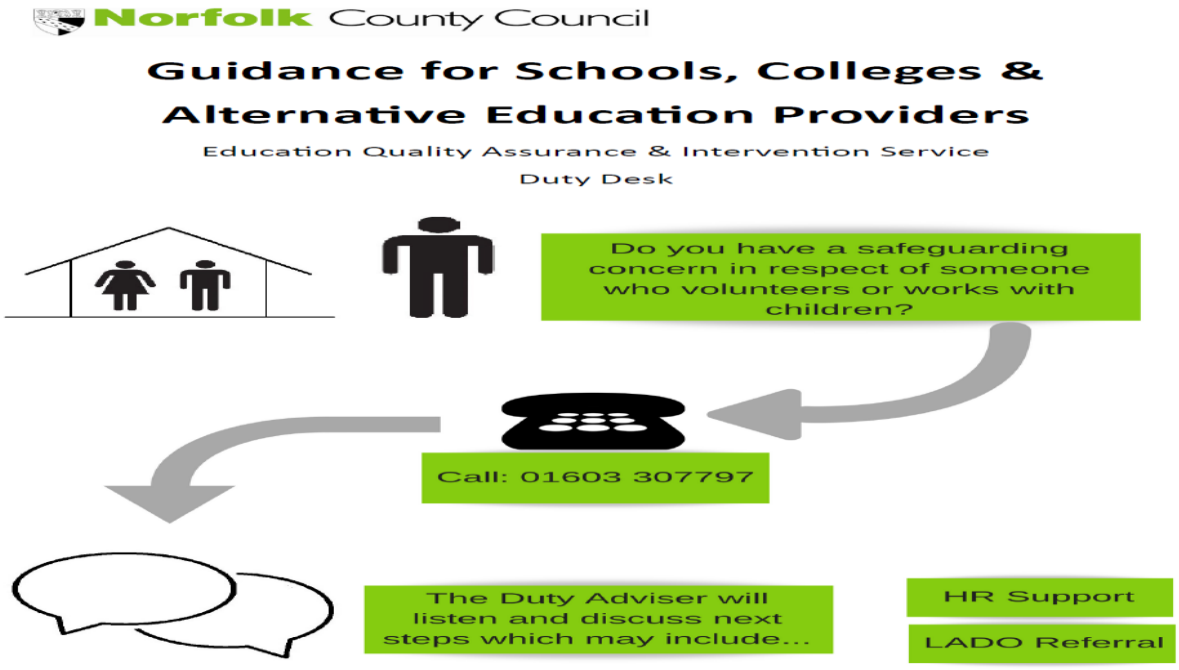
**Appendix 3: Local Safeguarding Procedures- Norfolk and Suffolk**

## Children's Advice and Duty Service- CADS (Norfolk) or Professional Consultation Line to speak with a MASH (Multi-Agency Safeguarding Hub) social worker. (Suffolk)

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



**Appendix 4: Advice for schools, colleges and alternative education providers where there are concerns about an adult who works within the setting. See below for the Norfolk and Suffolk information.**




Suffolk Safeguarding Partnership

Local Authority Designated Officers can be contacted via email on LADO@suffolk.gov.uk or using the LADO central telephone number **0300 123 2044** for advice and consultation.