Magnum Opus
TRAINING LIMITED

POLICIES AND PROCEDURES

# Child Protection and Safeguarding Policy – Children and young adults up to age 25

## Magnum Opus Training Limited

| LAST REVIEWED | NEXT REVIEW DUE |
|---|---|
| September 2026 | September 2027 |
| **APPROVED BY** | **ROLE** |
| Mr S King | Headteacher |

**Signature**



**Contents**


- 1. Purpose, scope and principles
- 2. Legislation, guidance and related policies
- 3. Definitions and safeguarding principles
- 4. Roles and responsibilities
- 5. Safeguarding before and during a placement
- 6. Recognising abuse, neglect and exploitation
- 7. What staff must do when a concern arises
- 8. Specific safeguarding procedures
- 9. Child-on-child harm and sexual harm
- 10. Safeguarding young adults aged 18–25
- 11. Attendance, missing students and leaving site
- 12. Online safety and personal devices
- 13. Parents, carers, commissioners and information sharing
- 14. Recording, confidentiality, retention and transfer
- 15. Concerns and allegations about adults; low-level concerns
- 16. Safer recruitment, visitors and safe working
- 17. Equality, SEND and students with additional vulnerabilities
- 18. Training, induction and support
- 19. Complaints, whistleblowing and escalation
- 20. Monitoring, review and governance
- Appendix A: Types and indicators of abuse
- Appendix B: Staff response and recording checklist
- Appendix C: Safer recruitment and pre-employment checks
- Appendix D: Allegations and low-level concerns procedure
- Appendix E: Specific safeguarding issues
- Appendix F: Norfolk and Suffolk contacts
- Appendix G: Pre-placement and staff induction checklists

## 1. Purpose, scope and principles

Magnum Opus Training Limited is a non-school alternative provision serving students placed by schools and local authorities in Norfolk and Suffolk. The provision may work with children under 18 and young adults aged 18–25, including students with Education, Health and Care Plans (EHCPs). This policy sets out how the provision prevents, recognises, records and responds to safeguarding concerns.

Child protection and adult safeguarding are related but distinct. Staff must use the correct pathway for the person's age and circumstances and must not assume that a young adult's EHCP means they are a child for safeguarding purposes.

This policy applies on site, during off-site activities, visits, travel or other provision-related activity, through online contact, and when staff receive information about a student's life outside the provision. Safeguarding is everyone's responsibility. No staff member should delay emergency action while waiting for permission from a commissioner, parent, DSL or another agency.

Our approach is trauma-informed, person-centred and attentive to communication needs. Staff must listen, take concerns seriously, explain what will happen next, avoid promising secrecy and act promptly. A change in behaviour may indicate distress or harm and must not automatically be treated as a behaviour issue.

## 2. Legislation, guidance and related policies

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children
Safe in Education (2026) and Working Together to Safeguard Children (2026),
the Children Acts, the Education Act 2002, the Equality Act 2010, the Human Rights Act 1998, the Counter-Terrorism and Security Act 2015, the Safeguarding Vulnerable Groups Act 2006, the Female Genital Mutilation Act 2003, the Care Act 2014 and the Mental Capacity Act 2005.

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners; The Local Authority (LA), Integrated Care Boards and The Chief Officer of Police.

Because Magnum Opus is a non-school alternative provision, the provider must check which school-specific duties and powers apply to it and which are guidance or good practice. Do not assume that every statutory duty applying to a school automatically applies to this provision.

Related documents include the Staff Code of Conduct, Behaviour and Attitudes Policy, Attendance Policy, Health and Safety Policy, Data Protection and Privacy Policy, recruitment procedures, individual EHCPs, support plans and risk assessments, and any online-safety or personal-device procedures.

The Headteacher and DSL must check the legislation, guidance, local thresholds and referral pathways referenced in this policy at each review and when relevant changes occur. References in this policy do not replace the need to follow current law and local procedures.

## 3. Definitions and safeguarding principles

- Safeguarding and promoting welfare includes providing help early, protecting children from maltreatment inside and outside the home (including online), preventing impairment of health or development, ensuring safe care, and taking action to support the best possible outcomes.
- Child protection is the part of safeguarding concerned with protecting individual children who are suffering, or are likely to suffer, significant harm.
- Abuse includes physical, emotional and sexual abuse, neglect, and other forms of maltreatment. Harm may be caused by an adult or another child, through action or failure to act, online or offline.
- Child-on-child harm includes bullying, physical assault, sexual harassment or violence, coercion, exploitation, discriminatory abuse, harmful sexual behaviour and harmful online conduct. It must never be dismissed as banter.
- Low-level concern means conduct by an adult working in or for the provision that may be inconsistent with the Staff Code of Conduct but does not, on the information available, appear to meet the threshold for a formal allegation referral. A concern may still be significant when considered alongside a pattern.
- Professional curiosity means noticing and exploring concerns respectfully rather than accepting an explanation at face value or making assumptions based on diagnosis, identity, disability or behaviour.

Possible indicators are prompts for professional curiosity, not proof of abuse. No single sign should be considered in isolation. Staff must record facts and refer concerns to a DSL rather than investigate or decide alone whether a referral threshold has been met.

## 4. Roles and responsibilities

### 4.1 All staff, volunteers, contractors and agency staff

- Read and follow this policy, the Staff Code of Conduct and relevant support/risk plans; complete safeguarding induction before unsupervised work.
- Know who the lead DSL and Deputy DSLs are, how to make a secure LearnTrek safeguarding record, and how to escalate if a DSL is unavailable or is the subject of a concern.
- Remain alert to signs of abuse, neglect, exploitation, harm between students, online harm, mental-health concerns and risks outside the provision.
- Respond calmly to disclosures; do not promise secrecy, ask leading questions, investigate, confront an alleged perpetrator or examine a student.
- Pass concerns to a DSL immediately and record facts promptly. Reporting to a DSL does not prevent direct emergency action, police contact or a referral where delay could put someone at risk.
- Maintain professional boundaries, use approved communication channels and protect confidential information.

### 4.2 Designated safeguarding lead and deputies

The lead DSL has lead responsibility for child protection and wider safeguarding, including coordination of referrals, advice to staff, records and chronologies, liaison with commissioners and agencies, review of open concerns and oversight of training. The DSL must be reachable during provision hours, and all staff must have access to their contact details. Deputy DSLs cover when the lead DSL is unavailable and must know how to act and escalate.

The DSL assesses immediate safety, the student's wishes and communication needs, risk to others, the correct child or adult safeguarding pathway, and whether specialist advice or referral is required. The DSL records decisions and reasons, including where a referral is not made. The DSL follows up referrals, checks that information has been received, monitors agreed actions and escalates if risk persists or the response is inadequate.

Should a situation arise where the Lead DSL and Deputy DSLs are unreachable, staff must follow the provision's safeguarding procedures and contact the relevant local authority safeguarding team directly.

- For children and young people in Norfolk, staff should contact the Children's Advice and Duty Service (CADS) on 0344 800 8021.
- For those in Suffolk, staff should contact Customer First on 0808 800 4005.
- If a child or young person is in immediate danger, staff must contact the emergency services on 999.

All actions taken must be recorded in accordance with the provision's safeguarding procedures.

### 4.3 Current safeguarding roles

| Role | Name | Details |
|---|---|---|
| **Lead DSL** | Scott King (Director / Headteacher) | Scottking@magnumopustraining.com |

| | | |
|---|---|---|
| **Deputy DSLs** | Tate Morris (Inclusion & Provision Manager)<br>Summer King (Attendance & Engagement Manager) | office@magnumopustraining.com<br><br>Attendance@magnumopustraining.com |
| **Allegation about lead DSL / Headteacher** | LADO Norfolk<br>LADO Suffolk | LADO@norfolk.gov.uk 0344 800 8020<br>LADO@suffolk.gov.uk 0300 123 2044 |

### 4.4 Board/directors and leadership

- Provide a culture in which safeguarding is prioritised and concerns can be raised without fear of reprisal.
- Ensure the DSL has appropriate authority, time, training, resources and access to senior decision-makers.
- Approve and review this policy, monitor its implementation and ensure safeguarding concerns, allegations and low-level concerns are handled appropriately.
- Ensure recruitment, training, records, risk assessments and arrangements with external providers are suitable.
- Appoint an appropriate person to lead the response where a concern involves the Headteacher/lead DSL, avoiding conflicts of interest.

## 5. Safeguarding before and during a placement

### 5.1 Information before a student starts

Before a placement starts, the Academy Lead should seek the current EHCP where applicable and relevant support plans, risk assessments and safeguarding information from the commissioning school or local authority. Information should include communication needs and strategies; known safeguarding/contextual risks; medical and emergency needs; parental responsibility where relevant; emergency contacts; authorised collection arrangements for children; the commissioner's DSL and case-worker details; and any agreed safety plan.

Relevant information must be shared securely with the DSL and staff who need it to keep the student safe. If essential information is missing, the Inclusion Manager must escalate to the commissioner and Headteacher before the placement begins. The Headteacher must decide and record whether the student can be safely received pending receipt of information and what temporary safeguards are required. The student should be introduced to the DSLs, reporting routes and support available in an accessible way.

### 5.2 During placement

- Keep individual support plans and risk assessments current and make relevant changes known to staff who need the information.
- Review class size, supervision and key-adult allocation where needed to support safe supervision, communication and response to distress.
- Invite the student's views and take account of them, including when accounts from a parent, carer or professional differ.
- Coordinate with the commissioning school or local authority, but do not delay urgent protective action while waiting for agreement or a reply.

**6. Recognising abuse, neglect and exploitation**

Staff should be alert to physical, emotional and sexual abuse; neglect; domestic abuse; child sexual exploitation (CSE); child criminal exploitation (CCE), including county lines; trafficking and modern slavery; harmful sexual behaviour; serious violence; radicalisation; online grooming and abuse; discriminatory abuse; forced marriage and so-called honour-based abuse; female genital mutilation (FGM); self-harm and mental-health concerns; and harm occurring outside the family home.

Potential indicators may include unexplained injuries, repeated absences, sudden changes in behaviour or presentation, fearfulness, sexualised behaviour or language not appropriate to development, withdrawal, controlling relationships, unexplained gifts or money, coercion by peers or adults, disclosures about online contact, or signs that basic needs are not being met. Indicators must be considered in context and recorded factually.

Students with SEND, communication differences, anxiety, trauma, disability, health needs or other vulnerabilities may face additional barriers to recognising or disclosing harm. Staff should use the student's communication strategies, allow processing time and avoid assuming that distress or dysregulation is merely a disciplinary matter.

## 7. What staff must do when a concern arises

### 7.1 Immediate danger or urgent medical need

1. Call 999 where someone is in immediate danger, a crime is in progress or urgent medical assistance is required. Take reasonable steps to keep people safe without placing yourself or others at unreasonable risk.
2. Tell a DSL as soon as possible. Emergency action must not wait for DSL approval.
3. Record what happened, the actions taken, times, people contacted and any reference numbers as soon as practicable.

### 7.2 A student discloses abuse or harm

- Listen calmly and allow the student to speak in their own way and at their own pace.
- Take the disclosure seriously. Reassure the student that they have done the right thing by telling you.
- Do not promise secrecy or confidentiality. Explain simply that you need to share information with people who can help keep them safe.
- Do not ask leading questions, press for details, investigate, confront the person alleged to have caused harm or ask the student to repeat the account unnecessarily.
- Record the student's words as accurately as possible, using quotation marks where appropriate. Distinguish what you saw, what the student said, what someone else reported and your professional judgement.
- Report the concern to a DSL immediately. If the DSL cannot be reached, or the situation requires urgent action, contact the relevant statutory service or police directly and inform the DSL as soon as possible.

### 7.3 General concern / early help

Pass concerns to the DSL promptly, even if they do not appear to indicate immediate danger. The DSL considers whether early help, advice, a referral to children's social care, adult safeguarding, police, Prevent or another service is appropriate. Staff may make a referral themselves where necessary; they must not assume that reporting internally is enough if the concern remains unaddressed.

Where a referral is made, record who made it, when, to whom, the information shared, any advice or decision, and the plan for follow-up. If no referral is made, record the rationale and review arrangements. If risk persists, escalates or the response is inadequate, the DSL or staff member must use local escalation procedures and seek further advice.

### 7.4 Concerns about extremism or radicalisation

Raise concerns with a DSL promptly. The DSL considers context, vulnerability, protective factors and current local Prevent advice, and decides whether a referral is appropriate. Faith, ethnicity, identity, neurodivergence or a single provocative statement does not by itself establish risk. Immediate threats or suspected criminal activity must be reported to police.

### 7.5 Mental health and self-harm

Mental-health difficulties may sometimes indicate that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation. If the concern is also a safeguarding concern, follow this policy's reporting and referral procedures immediately. Where there is no safeguarding

element, consult the DSL and follow the appropriate support and risk procedures. Immediate risk to life requires emergency assistance.

## 8. Specific safeguarding procedures

### 8.1 Female genital mutilation (FGM)

FGM is abuse and is illegal in the UK. Any concern that a student may be at risk must be passed to the DSL promptly. Staff must not examine a student. Where a teacher or other professional is personally subject to a statutory duty to report a known case of FGM in a girl under 18, that person must make the required report to police and inform the DSL; an internal referral does not replace the personal statutory duty. The DSL must seek current specialist advice and follow local procedures.

### 8.2 Child sexual exploitation and child criminal exploitation

Exploitation can involve coercion, manipulation, power imbalance, threats, violence, gifts, money, accommodation, transport, online contact or apparent consent. A child may not recognise that they are being exploited. Staff must report concerns promptly and avoid blaming or penalising the child for circumstances that may reflect coercion or exploitation.

### 8.3 Domestic abuse and family-related harm

Children may be harmed by witnessing, hearing or experiencing domestic abuse, coercive control, parental conflict, substance misuse or adult mental-health difficulties. Staff should record the impact on the student and refer concerns through the DSL. Do not contact a parent or alleged perpetrator where doing so may increase risk or prejudice an investigation.

### 8.4 Forced marriage and so-called honour-based abuse

Any concern about forced marriage, threats, restrictions, travel plans or so-called honour-based abuse must be treated seriously and referred immediately to the DSL. Do not approach family members or arrange mediation where this could increase danger. The DSL seeks specialist advice and follows current statutory guidance.

### 8.5 Modern slavery, trafficking and serious violence

Staff should be alert to indicators of trafficking, forced labour, criminal exploitation, county lines, gang-related coercion, weapons, serious violence and unexplained movement or control by others. Record the facts and refer promptly. Immediate danger or suspected serious crime requires police involvement.

### 8.6 Private fostering and children affected by parental offending

Pass to the DSL any concern that a child may be living in a private fostering arrangement, has a parent or carer in custody, or is otherwise affected by parental offending. The DSL should seek advice from the relevant local authority and ensure the child’s welfare and support needs are considered.

## 9. Child-on-child harm and sexual harm

The provision recognises that children and young people can harm their peers. Abuse must never be dismissed as banter, a joke, mutual conflict or a normal part of growing up. Most low-level disagreements may be addressed through the Behaviour and Attitudes Policy, but any behaviour raising safeguarding concerns must be referred to the DSL.

Examples include bullying, physical assault, coercion, threats, sexual harassment, sexual violence, harmful sexual behaviour, sharing intimate images, discriminatory abuse, exploitation and harmful online behaviour. The DSL must assess immediate safety, listen to each student separately where appropriate, consider risks beyond the provision and coordinate with commissioners and statutory services.

- Support and safety planning must consider all students involved, including the student reporting harm, the student alleged to have caused harm, witnesses and other students who may be affected.
- Do not conduct a criminal investigation, confront an alleged perpetrator, require a student to mediate or reconcile after sexual harm, or promise a particular outcome.
- Where sexual violence, assault or another serious crime is reported, seek prompt police and safeguarding advice. Do not delay a referral while attempting to resolve the matter internally.
- Protect privacy and anonymity as far as reasonably possible. Limit information to those who need it for safeguarding and support.
- A report that is unsubstantiated, unfounded or mistaken is not automatically malicious. Do not penalise a student for reporting in good faith. Only where evidence establishes deliberate fabrication or malicious intent should a proportionate behaviour response be considered, after safeguarding assessment and with the commissioner where appropriate.

### 9.1 Sharing of nude or semi-nude images

Staff must not view, copy, download, store or forward intimate images unless specifically advised through an appropriate safeguarding or police process. Do not ask a student to send or show an image. Preserve relevant information safely and seek DSL advice promptly; the DSL determines whether police, children’s social care or other specialist advice is required. Consider coercion, age, consent, exploitation, threats, the possibility of further distribution and the safety of all students involved.

**10. Safeguarding young adults aged 18–25**

An EHCP may continue beyond age 18, but a student aged 18 or over is an adult for safeguarding purposes. Staff must not automatically refer adult concerns to children's social care or assume that a parent or carer is entitled to information or can make decisions for the person.

- Involve the young adult in decisions, use accessible communication and presume capacity unless there is reason to question capacity for the particular decision.
- Seek the adult's consent to share information where practicable. Information may be shared without consent where there is a lawful basis, including serious risk, risk to others, suspected crime, an applicable best-interests decision where capacity is lacking, or another legal duty. Record the basis and advice obtained.
- Where there is reason to doubt capacity for a specific decision, follow the Mental Capacity Act framework and seek appropriate advice. Any action on behalf of a person who lacks capacity must be in their best interests and be the least restrictive available option.
- The DSL contacts the adult safeguarding service in the relevant local authority when abuse or neglect is suspected. The local authority determines whether the Care Act section 42 criteria are met; staff may still seek advice or other support when the threshold is uncertain.
- Inform the education commissioner or EHCP case worker where relevant and lawful, and agree who will coordinate the response.
- Inform a parent, carer or emergency contact in line with the adult's wishes, consent, capacity, support plan and applicable law—not automatically.
- Adults are not physically prevented from leaving simply because they choose to do so. The DSL considers immediate risk, capacity and agreed arrangements and contacts emergency services where necessary.

Where an incident involves a child and an adult student, the DSL considers both child-protection and adult-safeguarding pathways and seeks specialist advice. Safeguarding action must protect the child while respecting the adult's rights and legal status.

## 11. Attendance, missing students and leaving site

The Attendance Manager follows the Attendance Policy, records attendance in LearnTrek and contacts the family, commissioner or local authority as agreed when a student is unexpectedly absent. Absence, repeated missing episodes or a student's failure to return may indicate safeguarding risk. The DSL considers individual circumstances, known vulnerabilities, patterns, immediate danger and the need for referral.

If a student leaves site unexpectedly and there is no agreed safety plan, staff act promptly to establish their whereabouts, alert the DSL, contact the parent/carer or agreed contact as appropriate, notify the commissioning school/local authority and contact police where the risk warrants it. Staff must provide police with relevant risk information. Record the timeline of actions and decisions.

For adults aged 18 or over, respect the person's right to leave. If there is an immediate risk, uncertainty about capacity relevant to the decision, or an agreed safety plan, the DSL should seek appropriate advice and act proportionately. A safe, informed decision by an adult to leave must not be treated as equivalent to a missing child.

The commissioning school or local authority retains its own attendance and education responsibilities. Magnum Opus must share relevant information promptly and must not assume that another agency's role removes its own safeguarding responsibility.

## 12. Online safety and personal devices

Safeguarding concerns arising online must be treated with the same seriousness as offline concerns. Risks include grooming, sexual exploitation, harmful content, cyberbullying, threats, radicalisation, coercion, sharing of intimate images, unwanted contact and misuse of technology. Students do not currently have access to provision-owned devices or a student network on site. Before any such access is introduced, the Headteacher and DSL must review the safeguarding risks and ensure that appropriate safeguards, including filtering, monitoring, supervision and acceptable-use arrangements, are in place.

The provision must accurately describe its actual devices, network access, filtering and monitoring arrangements and must not claim systems or controls that are not in place. Before changes to student access take effect, this policy and relevant procedures must be updated, and staff and students must be informed of the arrangements.

- Students may use personal phones at break and lunch only in accordance with the Behaviour and Attitudes Policy and any individual risk plan.
- Staff must not use personal phones to photograph or record students. Use approved communication channels and follow the Staff Code of Conduct.
- Staff must not assume they have school-style statutory search powers over a student's phone. Do not search, copy or forward content without appropriate authority and advice.
- If online learning is provided during a closure, the Headteacher and DSL must establish appropriate arrangements for approved platforms, staff conduct, privacy, reporting routes and commissioner liaison.
- Concerns about harmful content, online contact or suspected evidence must be reported to a DSL promptly. Preserve relevant details safely and seek police or specialist advice where appropriate.

### 12.1 Filtering and monitoring

The leadership team must assess what filtering and monitoring duties and standards apply to this non-school provision, taking account of the actual network and devices in use, commissioning requirements and current guidance. Where student access is provided, suitable safeguards must be assessed and implemented before access begins. The policy and staff training must accurately explain the controls and how concerns are reported.

## 13. Parents, carers, commissioners and information sharing

Parents and carers should normally be informed and involved when a concern arises about a child, unless doing so could increase risk, place the child at further harm, prejudice an investigation, or conflict with advice from children's social care or police. The DSL records the decision and rationale if a parent/carer is not informed.

For young adults aged 18–25, information sharing must respect adult status, consent, capacity and lawful safeguarding grounds. A parent or carer is not automatically entitled to confidential information.

The DSL works with the commissioning school or local authority, children's social care, adult safeguarding, police, health professionals and other relevant agencies. Magnum Opus provides factual observations, attendance and incident information promptly when lawfully requested. Where invited to safeguarding meetings, the DSL prepares relevant information, attends or arranges appropriate representation, records decisions and completes actions assigned to the provision.

The provider must not delay emergency action or a necessary referral while waiting for a commissioner's response. If agencies disagree or action is not effective, the DSL follows local escalation procedures and records the steps taken.

## 14. Recording, confidentiality, retention and transfer

### 14.1 Safeguarding records

Record safeguarding concerns, discussions, decisions, referrals and follow-up promptly in LearnTrek, using the restricted safeguarding record. If LearnTrek is unavailable, make a secure dated temporary record and transfer it when the system is available. Do not put sensitive safeguarding detail in general attendance or behaviour notes, ordinary group messages or WhatsApp.

Each record should include, as relevant:

- Student's name and identifying details, date, time, location, people present and who first received the concern.
- A clear, factual description of what was seen or heard, including the student's own words where possible.
- Communication needs, the student's wishes and immediate safety needs, and support offered.
- Who was told, when, the advice received, referrals made, reference numbers and confirmation of receipt.
- Decisions and reasons, including a decision not to refer, not to inform a parent/carer or to share information without consent.
- Actions, named owner, review date, chronology updates, outcome and any outstanding concerns.

### 14.2 Confidentiality and information sharing

Safeguarding information is shared on a need-to-know basis and only with people who need it to protect the student or others. Data protection must not be used as a reason to withhold information where sharing is necessary and lawful to safeguard a child or adult. If uncertain, staff should seek advice from the DSL; this must not delay urgent action.

The DSL keeps information accurate, secure and up to date. Records must distinguish fact, the student's account, third-party information and professional judgement. The DSL maintains a dated chronology for continuing cases and records the rationale for key decisions, including why a referral was or was not made.

### 14.3 Retention and transfer

Safeguarding records are not deleted simply because a concern is unsubstantiated or a placement ends. Retention, access, secure storage and disposal must follow the provider's data-protection and records-retention arrangements and any relevant statutory or agency requirements. When a child moves placement, the DSL coordinates secure and timely transfer of relevant safeguarding information, confirms receipt and records the transfer. For adults, consider consent, capacity, risk and lawful sharing. The provider retains its own records in accordance with its retention arrangements and any legal hold.

## 15. Concerns and allegations about staff; low-level concerns

### 15.1 Allegations meeting the harm threshold

All concerns about employees, volunteers, contractors, agency/supply staff and directors must be reported promptly. If information suggests that an adult has harmed or may have harmed a child, may have committed a related criminal offence, may pose a risk of harm to children, or may be unsuitable to work with children, report it immediately to the Headteacher/case manager unless that person is the subject of the concern or there is a conflict of interest.

The case manager seeks advice from the Local Authority Designated Officer (LADO) for the relevant local authority area before investigating or informing the adult concerned, unless immediate protective action or police involvement cannot wait. Follow LADO and local procedures, record advice and decisions, and consider proportionate protective action. Suspension is not automatic and should be considered only where necessary and after appropriate advice.

Any allegation or safeguarding concern involving the Lead DSL, Headteacher or another senior person responsible for safeguarding must be managed independently of the individual concerned. Staff must report the concern directly to the relevant Local Authority Designated Officer (LADO) where it concerns an adult working with children and may meet the threshold for an allegation.
No permission from the person who is the subject of the concern is required. In cross-border cases, seek advice promptly from the relevant Norfolk or Suffolk authority rather than delaying action.

Staff must not report the concern to the person who is the subject of the allegation, discuss the allegation with them, or wait for their permission before taking action. Staff must not attempt to investigate the allegation themselves, interview the person concerned or take action that could compromise a safeguarding or police investigation. They must follow the advice of the relevant safeguarding authorities.

If the relevant LADO cannot be reached, staff must send the concern and their contact details to the appropriate LADO email address and retain a record of the attempt. If a timely response is not received, they must escalate the matter to the relevant local authority safeguarding service or senior safeguarding manager and continue escalating until the concern has been acknowledged and an appropriate course of action agreed. If there is an immediate risk of harm or a suspected crime requiring urgent intervention, staff must contact the police on 999 where appropriate.

All concerns, referrals, advice received and actions taken must be recorded securely, including dates, times, the people contacted and any reference numbers. Information must be shared only with those who need it to protect children and support the appropriate process.
If staff believe that the concern has not been dealt with appropriately, that a child remains at risk, or that there is a conflict of interest in the response, they must escalate the matter to the relevant local authority safeguarding manager or safeguarding partnership. Staff may also seek independent whistleblowing advice from the NSPCC Whistleblowing Advice Line on 0800 028 0285. This does not replace the need to make a safeguarding referral where one is required.

For concerns about an adult student aged 18 or over, the DSL or an independent director seeks advice from adult safeguarding and the local authority's people-in-positions-of-trust process where relevant. LADO is the route for concerns about adults working with children; it is not a general adult-safeguarding route.

**15.2 Low-level concerns**

A low-level concern is any concern, however small, that an adult's conduct may be inconsistent with the Staff Code of Conduct and does not appear to meet the harm threshold on the information available. Examples may include boundary concerns, inappropriate one-to-one arrangements, humiliating language, taking images on a personal phone or behaviour that could be misinterpreted.

- Staff should report low-level concerns to the Headteacher/case manager promptly and may self-report.
- Concerns about the Headteacher/lead DSL must be reported through the external route or to an appropriate independent director/commissioner where safe and suitable.
- The recipient records the concern, context, actions and rationale confidentially and separately from student files.
- Patterns and cumulative concerns must be considered; a concern is not dismissed merely because it appears minor in isolation.
- If the threshold is uncertain or concerns accumulate, seek LADO advice.
- Where required, follow legal and local procedures for referral to the Disclosure and Barring Service (DBS) and any relevant professional regulator.

## 16. Safer recruitment, visitors and safe working

### 16.1 Safer recruitment

The provider uses safer recruitment procedures proportionate to each role and the applicable legal requirements. Before appointment and before unsupervised work, the Headteacher or delegated person verifies role eligibility and completes the checks required and permitted for that role. Checks may include identity, right to work, references, employment history and gaps, relevant qualifications, criminal record/DBS checks and barred-list checks where legally permitted and required.

Offers should be conditional on satisfactory checks. A DBS certificate is one element of safer recruitment and does not replace references, suitability assessment, supervision or a safe culture. Checks and decisions must be recorded securely in the central record. On request, the provider may give a commissioning school or local authority written confirmation that required checks have been completed, using a secure and lawful process.

### 16.2 Visitors and external providers

Visitors sign in, are identified and supervised according to the purpose and risk of their visit. A DBS check does not mean that a visitor can automatically have unsupervised access to students. Staff must report concerns about visitors or external professionals through the usual safeguarding route. Where another organisation provides services or activities on site, leadership should seek appropriate assurance about its safeguarding arrangements and make safeguarding expectations a condition of site use.

### 16.3 Safer working and professional boundaries

- Maintain professional boundaries and use approved communication channels.
- One-to-one support must be necessary, appropriately planned and consistent with the student's support plan and site risk assessment, including any agreed CCTV arrangements.
- Report or record situations that could be misinterpreted, including accidental contact, boundary concerns or deviations from agreed arrangements.
- Home visits take place with two staff members under the Health and Safety Policy.
- Do not use personal devices to photograph or record students, and do not communicate with students through personal social-media accounts.

## 17. Equality, SEND and students with additional vulnerabilities

The provision is committed to anti-discriminatory practice. All students must receive safeguarding protection regardless of disability, SEND, health needs, race, ethnicity, religion, sex, sexual orientation, gender identity, language, immigration status or family circumstances. Staff should consider additional barriers to disclosure and the possibility that some students are targeted because of perceived difference.

Particular attention may be needed for students who are disabled or have SEND; have communication differences or English as an additional language; are young carers; are looked-after or previously looked-after; have a social worker; are missing or persistently absent; are experiencing homelessness or unstable accommodation; are affected by domestic abuse, substance misuse or adult mental-health needs; are at risk of exploitation, trafficking, FGM, forced marriage or radicalisation; or are asylum seekers.

Use the student's EHCP, support plan, communication passport or other known strategies where available. Offer a trusted adult, a quieter space, writing or another communication method, extra processing time and breaks where appropriate. A diagnosis is not required before a student's account is taken seriously. Do not assume a behaviour associated with autism, PDA-type demand avoidance, anxiety, burnout or dysregulation is either proof of abuse or a reason to dismiss a concern.

### 17.1 Students with a social worker / looked-after children

Where a child has a social worker or is looked after or previously looked after, the DSL liaises with the relevant social worker, virtual school or local authority contacts as appropriate. Staff should understand relevant plans and actions needed to support safety, attendance, stability and wellbeing. The provider must confirm which named professional contacts and procedures apply to each placement.

## 18. Training, induction and support

All staff and volunteers receive safeguarding induction before working unsupervised with students. Induction includes the identity and contact route of DSLs; how to respond to a disclosure; emergency procedures; how to make a LearnTrek safeguarding record; child and adult referral routes; external escalation where a DSL is unavailable or is the subject of a concern; professional boundaries; confidentiality and information sharing; attendance/missing-student procedures; and the relevant code of conduct and support/risk plans.

Staff must receive safeguarding and child-protection training appropriate to their role and regular updates when guidance, local procedures or risks change. DSLs and deputies must maintain role-appropriate training and refresh it in line with current requirements and guidance. Adult safeguarding, mental capacity, online safety, Prevent and safer recruitment training should be provided where relevant to the person's responsibilities.

Staff should be able to seek advice after a difficult disclosure or incident. The provider should support staff while maintaining confidentiality and avoiding unnecessary sharing of sensitive details.

## 19. Complaints, whistleblowing and escalation

All staff have a responsibility to act if they believe a safeguarding concern has not been appropriately addressed. Staff must not assume that a concern has been resolved simply because it has been passed to a manager or recorded internally.

Where a concern relates to the Lead DSL, Headteacher or another senior person responsible for safeguarding, or where staff believe there is a conflict of interest, they must bypass the usual internal reporting route and contact the relevant external safeguarding authority directly, as set out in Section 15.

Where a concern has already been referred but staff believe the response is inadequate, no action has been taken, or a child or young person remains at risk, staff must:

1. Request clarification and an update from the relevant safeguarding authority, recording the response received.
2. Escalate the matter to the relevant local authority safeguarding manager or safeguarding partnership if the concern remains unresolved.
3. Contact the police if they believe a criminal offence may have occurred or immediate intervention is required.
4. Seek independent whistleblowing advice from the NSPCC Whistleblowing Advice Line on 0800 028 0285, where appropriate.

Staff must continue to take reasonable steps to protect the child or young person while the concern is being escalated. No member of staff will be prevented from raising a safeguarding concern with an external authority because they have already reported it internally.

All actions, decisions, contacts and responses must be recorded securely. Staff raising concerns in good faith will be supported and must not be subjected to detrimental treatment for doing so.

**20. Monitoring, review and governance**

The Headteacher/DSL and board/directors review the effectiveness of this policy at least annually and after a serious incident, significant change in law or guidance, or change in local procedures. Monitoring should consider safeguarding records, referral and escalation outcomes, attendance/missing-student incidents, allegations and low-level concerns, training completion, recruitment checks and feedback from students, staff, families and commissioners.

This policy must be accessible to staff, students, families and commissioners in an appropriate format. The provider must ensure the final version reflects actual practice and is approved through the correct governance process. Any local authority-specific procedure must be checked against the relevant authority's current published guidance.

## Appendix A: Types and indicators of abuse

### A1. Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. It may also include fabricated or induced illness. Possible indicators include unexplained injuries, injuries inconsistent with an explanation, repeated injuries, fear of going home or reluctance to discuss an injury. Indicators are not proof; record facts and refer concerns.

### A2. Emotional abuse

Emotional abuse is persistent emotional maltreatment that has a severe adverse effect on development. It may include conveying that a child is worthless or unloved, imposing developmentally inappropriate expectations, silencing or ridiculing them, or exposing them to frightening experiences or exploitation. Possible indicators include persistent withdrawal, fearfulness, extreme compliance, aggression, low self-esteem or developmental changes.

### A3. Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It may include physical contact, penetrative or non-penetrative acts, or non-contact activities such as involving children in looking at or producing sexual images, watching sexual activities, grooming or sexual exploitation. Possible indicators include disclosures, sexualised behaviour or language, distress, injuries, coercive relationships or online contact. Do not investigate.

### A4. Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of health or development. It may include failure to provide food, clothing, shelter, supervision, medical care or emotional care, or failure to protect from danger. Possible indicators include persistent hunger, poor hygiene, unsuitable clothing, untreated medical needs, inadequate supervision, developmental concerns or repeated absence.

### A5. Exploitation and contextual harm

Children may be exploited sexually or criminally by adults or peers, including through county lines, trafficking, coercion, threats, debt, gifts, online contact or apparent relationships. Harm can occur in the community, in peer groups, during travel, in temporary accommodation or online. Consider power imbalance, patterns, coercion and the child's ability to keep themselves safe.

### A6. Domestic abuse and harmful relationships

Domestic abuse can affect children directly or through seeing, hearing or experiencing its effects. Coercive control, stalking, threats, violence, parental conflict and family substance misuse may affect safety and wellbeing. Consider the whole context and refer concerns promptly.

**Appendix B: Staff response and recording checklist**

- Is anyone in immediate danger or in need of urgent medical help? If yes, call 999 and take reasonable steps to keep people safe.
- Listen calmly; reassure the student; do not promise secrecy, investigate, ask leading questions or confront anyone.
- Tell the lead DSL or a Deputy DSL immediately. If none can be reached and action is needed, contact the relevant service or police directly.
- Record date, time, location, people present, what was seen or said, and the student's words where possible.
- Separate facts, third-party information and professional judgement. Do not include assumptions or unsupported conclusions.
- Record the student's communication needs, wishes, immediate safety needs and support offered.
- Record who was informed, advice received, referrals and reference numbers, decisions and reasons, actions assigned and review dates.
- Store the record in the restricted LearnTrek safeguarding system. If unavailable, make a secure temporary record and transfer it later.
- Do not put sensitive details in general attendance/behaviour notes, WhatsApp or ordinary group messages.
- Escalate if a concern is not acted on, the response is inadequate, risk increases or the student remains unsafe.

**Appendix C: Safer recruitment and pre-employment checks**

Before appointment, the responsible manager should confirm and record the checks legally required and permitted for the role. The precise checks depend on the role, the activity, whether it is regulated activity and current legislation.

- Verify identity and right to work.
- Obtain and scrutinize references; explore gaps in employment or education and discrepancies in the application.
- Verify qualifications or professional status where relevant.
- Complete the appropriate DBS check and barred-list check where legally eligible, required and permitted.
- Assess suitability, conduct and safeguarding understanding during recruitment and interview.
- Record checks and decisions securely in the central record and ensure required checks are completed before unsupervised work begins.
- Apply appropriate checks and supervision to agency/supply staff, contractors, volunteers and visitors.
- Provide written confirmation of required checks to a commissioning school or local authority where requested and lawful.

At least one person on an interview panel should have safer-recruitment training where the applicable requirements or provider procedure call for it. The Headteacher must verify the current legal position and document the provider's chosen standard.

## Appendix D: Allegations and low-level concerns procedure

### D1. Concern potentially meeting the harm threshold

1. Report immediately to the Headteacher/case manager, unless they are the subject of the concern or there is a conflict of interest.
2. Where the concern is about the Headteacher/lead DSL, report directly to the relevant LADO or other appropriate external authority.
3. Seek LADO advice promptly and follow the relevant local procedure; do not conduct an internal investigation before advice unless immediate safety action is necessary.
4. Take immediate steps to protect students and others, without prejudging the outcome.
5. Record the allegation, source, exact words where possible, advice, decisions, rationale, actions, referrals and outcome securely.
6. Consider DBS and professional-regulator referral duties where applicable.

### D2. Low-level concern

1. Report to the Headteacher/case manager promptly; concerns about the Headteacher/lead DSL go through the external route.
2. Record the conduct, context, date, people involved, advice, action and rationale.
3. Consider whether the concern links to previous concerns or forms a pattern.
4. Seek LADO advice if the threshold is uncertain or the pattern suggests the harm threshold may be met.
5. Keep records confidential and separate from student safeguarding records.

## Appendix E: Specific safeguarding issues

### E1. Bullying and discriminatory abuse

Bullying, including cyberbullying, prejudice-based bullying, homophobic, biphobic, transphobic or racist abuse, must be addressed. Repeated or serious incidents may be safeguarding concerns. Record the impact, protect the student and follow the relevant behaviour and safeguarding procedures.

### E2. Sexual harassment and sexual violence

Unwanted sexual comments, touching, coercion, assault, threats and online sexual harm must be taken seriously. Protect students, seek DSL and statutory advice, avoid mediation after sexual harm and preserve confidentiality.

### E3. Online grooming and harmful content

Report concerns about adults or peers contacting students online, requests for images, coercion, blackmail, harmful content or radicalisation. Do not forward or circulate content; seek DSL/police advice.

### E4. Missing education / repeated absence

Repeated or unexplained absence may indicate neglect, exploitation or other risk. Follow the Attendance Policy, check the individual context, inform the DSL and commissioner, and use the appropriate local authority route when necessary.

### E5. Children with a social worker or in care

Share relevant information with the social worker, virtual school or local authority in line with the child's plan and lawful information-sharing arrangements. Record actions and follow-up.

### E6. LGBTQ+ students

Provide a safe, respectful environment where students can raise concerns. Do not make assumptions about risk or identity; respond to bullying, coercion, abuse or discrimination promptly and sensitively.

### E7. Self-harm and suicide risk

Take disclosures and warning signs seriously. If immediate danger exists, call emergency services. Notify a DSL, follow the relevant risk and support plan, and seek appropriate health or crisis support. Record actions.

### E8. Female genital mutilation, forced marriage and honour-based abuse

Treat concerns as urgent safeguarding matters. Do not approach family members where this could increase risk. Follow the specific duties and specialist referral routes applicable to the individual case.

### E9. Radicalisation and Prevent

Consider the full context, vulnerability and protective factors. Seek current local Prevent advice through the DSL. Do not equate identity or belief with risk. Immediate threats go to police.

**Appendix F: Norfolk and Suffolk contacts**

In an emergency, call 999. For non-emergency police contact, call 101.

| Area / service | Details |
|---|---|
| **Norfolk children's services** | Children's Advice and Duty Service for professionals (CADS): 0344 800 8021 |
| **Norfolk Adult Safeguarding** | 0344 800 8020 |
| **Norfolk LADO** | LADO@norfolk.gov.uk |
| **Suffolk children's services** | Suffolk Safeguarding Partnership child concern portal or Customer First: 0808 800 4005 |
| **Suffolk Adult Safeguarding** | Online adult safeguarding referral form, with customer first at 0808 800 4005 if the portal cannot be used.<br>MASH consultation line: 0345 606 1499 |
| **Suffolk LADO** | LADO@suffolk.gov.uk; 0300 123 2044 |
| **Norfolk adult safeguarding** | Online portal or 0344 800 8020; ask about People in a Position of Trust process |
| **Suffolk adult safeguarding** | Adult safeguarding portal; MASH professional consultation line 0345 606 1499; Customer First 0808 800 4005 if portal unavailable |
| **NSPCC whistleblowing advice** | 0800 028 0285 |
| **NHS 111 – urgent mental health support** | Call 111 and select Mental Health; listed as 24/7 support for adults and young people. |

If the relevant local authority is unclear in a cross-border case, staff should seek prompt advice from the appropriate authority and must not delay protective action. Use the local authority relevant to the student and the concern.

## Appendix G: Pre-placement and staff induction checklists

### G1. Pre-placement safeguarding checklist

- ☐ Current EHCP, support plan and risk assessment requested and received where applicable.
- ☐ Communication needs, trusted adults and accessible disclosure methods identified.
- ☐ Known safeguarding/contextual risks, medical needs and emergency arrangements reviewed.
- ☐ Parental responsibility, emergency contacts and authorised collection arrangements confirmed for children.
- ☐ Commissioner's DSL and case-worker contact details confirmed.
- ☐ Relevant information shared securely with the lead DSL and staff who need it.
- ☐ Missing information escalated to the Headteacher; decision and temporary safeguards recorded.
- ☐ Student shown who the DSLs are and how to seek help in an accessible format.

### G2. Staff safeguarding induction checklist

- ☐ Knows the lead DSL, Deputy DSLs and on-duty DSL contact route.
- ☐ Can explain how to respond to a disclosure and what not to do.
- ☐ Knows how to call emergency services and when to refer directly.
- ☐ Knows how to make a LearnTrek safeguarding record and what information to include.
- ☐ Knows child and adult referral routes, including how to escalate if a DSL is unavailable.
- ☐ Knows how to report a concern about the Headteacher/lead DSL.
- ☐ Has read the safeguarding policy, Staff Code of Conduct, Behaviour and Attitudes Policy, Attendance Policy and relevant support/risk information.
- ☐ Understands professional boundaries, one-to-one working, personal devices, confidentiality and secure information sharing.
- ☐ Role-appropriate safeguarding training and recruitment checks have been recorded; outstanding actions are assigned.

Staff member / volunteer: _____
Manager: _____
Date: _____