



SAFEGUARDING POLICY FOR UNREGISTERED ALTERNATIVE PROVISION INCORPORATING CHILD PROTECTION

Elevate-Ed

Policy Consultation & Review

This policy is on our website and is available on request from safeguarding@elevate-ed.org.uk. We provide commissioners with this policy during pre-placement planning, and we also inform parents and carers about this policy when their children join our setting.

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

The policy is provided to all staff at induction alongside our Staff Code of Conduct and behaviour policy. In addition, all staff are provided with Part One of the statutory guidance '[Keeping Children Safe in Education](#)'.

All staff receive training on safeguarding procedures at Elevate-Ed on joining the company. An annual update is provided in September. In addition, all staff are provided with [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#) staff are required to read Part One following the updates every September, and sign to say that they have read and understood the document.

This policy will be reviewed in full by Aaron Guy (Georgia Guy QA) on an annual basis. This policy was last reviewed on 04/09/2025

Signature Aaron Guy Proprietor Date: 04/09/2025

Signature Georgia Guy QA lead / Safeguarding Oversight Date:
04/09/2025



Contents

1. [Key contacts](#)
2. [Purpose and aims](#)
3. [Company ethos](#)
4. [Roles and responsibilities](#)
5. [Training and induction](#)
6. [Procedures for managing concerns](#)
7. [Specific safeguarding issues](#)
8. [Recording and information sharing](#)
9. [Working with commissioners](#)
10. [Child Protection conferences](#)
11. [Safer recruitment](#)
12. [Safer working practice](#)
13. [Managing allegations and concerns](#)
14. [Relevant policies and guidance](#)
15. [Appendix 1](#) Recording form for reporting concerns
16. [Appendix 2](#) Induction checklist for staff and volunteers
17. [Appendix 3](#) Local safeguarding procedures [CADS]
18. [Appendix 4](#) Advice for providers where there are concerns about an adult who works within the setting
19. [Appendix 5](#) Confirmation of staff safeguarding checks for commissioners



1. Key contacts

Name	Role	Email	Telephone
Aaron Guy	Founder/DSL	Aaronguy@elevated.org.uk	07534 765292
Georgia Guy	QA/lead / Safeguarding Oversight	Georgiaguy@elevated.org.uk	07872 626342
Currently vacant; DSL role covered by proprietor Additional safeguarding oversight is provided by the QA Lead.	Deputy Safeguarding lead		
Children's Advice and Duty Service (CADS) Norfolk County Council Norfolk Community Directory	Single point of contact for raising concerns about a child.	n/a	0344 800 8021
Local Authority Education Duty Desk	Advice where there is a concern about an adult working with a child	n/a	01603 307797
LADO	Making referrals about an adult who may have caused harm to a child, using LADO referral form	LADO@norfolk.gov.uk	Call the Duty Desk above for advice before making a LADO referral

Unregulated alternative provision settings must have due regard to the safeguarding of the children attending the placement. As noted in [Working together to safeguard children - GOV.UK \(www.gov.uk\)](#), **Rapid reviews and child safeguarding practice reviews have highlighted that missed opportunities to record, understand the**



significance of, and share information in a timely manner can have severe consequences for children

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

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

2. Purpose and aims

2.1

The purpose of **Elevate-Ed's safeguarding policy** is to ensure every child who attends the setting is safe and protected from harm. This means we will always aim to be:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework and *Working Together to Safeguard Children (2023)*

2.2

This policy will give clear direction to all staff, freelance practitioners, volunteers, commissioners, parents, carers, visitors and learners about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at **Elevate-Ed**.

2.3

Elevate-Ed fully recognises the contribution it can make to protect children from harm and to support and promote the welfare of all children who attend our setting. The elements of our policy are prevention, protection and support.



This policy applies to all children, staff, freelance practitioners, volunteers, commissioners, parents and carers, and visitors.

3. Company ethos

3.1

The child's welfare is of paramount importance at **Elevate-Ed**. Our setting will establish and maintain an ethos where young people feel secure, are encouraged to talk, are listened to and are safe. Learners at **Elevate-Ed** will be able to talk freely to any member of staff, freelance practitioner or volunteer if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

3.2

We recognise that staff and practitioners at **Elevate-Ed** play an important role as they are able to identify concerns 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 must always act in the best interests of the child.

3.3

At **Elevate-Ed** we ensure that safeguarding and child protection is at the forefront of, and underpins, all relevant aspects of process and policy development. We operate with the best interests of the child at their heart.

3.4

Where there is a safeguarding concern, the child's wishes and feelings are considered 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 that they can safely express their views and give feedback. Our systems are designed to ensure that schools and other commissioners, such as the local authority, are informed without delay where there is a safeguarding concern.

3.5

All staff, freelance practitioners and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a child's disclosure and how to record and report the 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 disclosed. All staff will be trained to recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. At all times we will work in partnership and endeavour to establish effective working relationships with schools, other commissioners, parents, carers and colleagues from other agencies in line with *Working Together to Safeguard Children (2023)* ([see Working Together](#)) and [the Norfolk multi-agency safeguarding arrangements](#).



3.6

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

3.7

Elevate-Ed will ensure that pre-placement, the following information is recorded:

- If a school is the commissioner, the name and contact details for the home school's Designated Safeguarding Lead.
- If the local authority is the commissioner, the name, telephone number and email for the local authority officer commissioning the placement and/or key contact at the Virtual School for Children in Care or Previously in Care, as appropriate.
- A clear service level agreement on how safeguarding concerns will be communicated, followed up and by whom, and how regular communication between the home school/commissioner and **Elevate-Ed** will be assured.
- A pupil-specific risk assessment.
- Emergency contact details for the pupil.
- Key medical information.

Additional guidance on pre-placement procedures is available (see [Unregulated Alternative Provision templates](#))

3.8

At **Elevate-Ed** we understand the importance of working in a way that adheres to the following legislation:

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

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

4. Roles and responsibilities

4.1

The proprietor of **Elevate-Ed**, Aaron Guy, is responsible for ensuring that:



- all staff, freelance practitioners and volunteers carry out all the requirements of this policy
- all adults working with children safeguard and promote their welfare at all times
- all staff receive appropriate safeguarding induction on appointment
- all staff are adequately trained to carry out safeguarding duties
- all staff maintain timely and detailed records of safeguarding
- the safeguarding lead has sufficient time to carry out their duties
- this policy is reviewed and updated annually
- all staff read and sign annually to say they have read and understood Part One of *Keeping Children Safe in Education (2025)* (see [KCSIE](#))
- procedures are in place for dealing with allegations against members of staff or volunteers, in line with Norfolk Safeguarding Children Partnership guidance (see [NSCP Allegations Protocol](#))
- procedures are in place for promptly informing schools and commissioners of safeguarding concerns
- safeguarding records are maintained confidentially and securely
- safer recruitment practices are followed
- placement procedures with **Elevate-Ed** include detail on when and how safeguarding concerns are reported back to schools and other commissioners
- placement paperwork includes contact details for the commissioning schools' Designated Safeguarding Lead
- sufficient information is provided to visitors on how to report a safeguarding concern (e.g., by providing a leaflet on arrival, or having a poster in the teaching space).

4.2

The safeguarding lead, **Aaron Guy**, is responsible for:

- informing schools and commissioners of safeguarding concerns without delay
- maintaining accurate safeguarding records
- ensuring that safeguarding records are maintained confidentially and securely
- maintaining an accurate central log of home school Designated Safeguarding Lead and/or other commissioner contact details.

4.3

The proprietor and safeguarding lead(s) are advised to sign up to **Norfolk Schools Ecourier** to receive weekly Management Information sheets. These often contain safeguarding updates for schools and may be of value to unregistered AP settings.

4.4

Independent Quality Assurance (QA) Oversight: **Elevate-Ed** benefits from additional safeguarding oversight provided by **Georgia Guy (QA Lead)**. This role is not responsible for managing disclosures or referrals but ensures:



- periodic review of safeguarding practice and compliance
- safeguarding policies remain aligned with statutory and local guidance
- staff are supported in reflective discussions around safeguarding issues.

5. Training and induction

5.1 Induction

When new staff, freelance practitioners or volunteers join **Elevate-Ed** they will be informed of the safeguarding arrangements in place. All staff will be given a copy of this safeguarding policy, the Staff Code of Conduct, the Behaviour Policy (where relevant), and Part One of *Keeping Children Safe in Education (2025)* (see [KCSIE](#)). Staff are expected to read these documents and sign to confirm they have understood them.

They will also be provided with:

- contact details for the Designated Safeguarding Lead (DSL)
- information on how to record and report safeguarding concerns
- clear expectations around safer working practices, including for 1:1 and off-site sessions.

5.2 Safeguarding induction training

Every new member of staff, freelance practitioner or volunteer will receive safeguarding training during their induction. This will include:

- recognising signs and symptoms of abuse and neglect
- how to manage a disclosure from a child (including reassurance, not promising confidentiality, and immediate reporting)
- **Elevate-Ed's** safeguarding procedures, including use of the Safeguarding Concerns Form
- referral processes to the Children's Advice and Duty Service (CADS)
- the remit and responsibilities of the DSL
- whistleblowing procedures in respect of concerns about another adult's behaviour or suitability to work with children (see [NSPCC Whistleblowing Helpline](#); see [GOV.UK Whistleblowing Advice](#))
- expectations for online safety, including filtering, monitoring and safe use of technology in line with **Elevate-Ed's** Online Safety Policy.

5.3 Ongoing training and updates

To ensure practice remains current and compliant, **Elevate-Ed** will provide:

- annual safeguarding training for all staff, freelance practitioners and volunteers
- regular safeguarding updates (for example, via email, supervision or meetings) to respond to changes in legislation, local guidance or identified risks



- Prevent Duty training for all staff as part of safeguarding induction, with updates as required (see [Prevent Duty](#))
- DSL-specific training for the Designated Safeguarding Lead at least every two years, with additional local updates through the Norfolk Safeguarding Children Partnership (NSCP).

5.4 Mechanisms to support understanding

In addition to formal training, **Elevate-Ed** ensures staff, freelance practitioners and volunteers are supported to understand their responsibilities by:

- sharing Norfolk Safeguarding Children Partnership updates (see [NSCP](#) –and Norfolk Schools Ecourier briefings
- offering reflective practice sessions led by the QA Lead (Georgia Guy)
- ensuring freelance practitioners are included in policy updates and asked to re-sign to confirm awareness of any changes.

5.5 Commissioners and parents/carers

Commissioners (schools, local authorities) are informed of **Elevate-Ed's** safeguarding procedures during pre-placement discussions. Parents and carers are signposted to this policy via **Elevate-Ed's** website and may request a copy at any time.

6. Procedures for managing concerns

6.1 General principles

Elevate-Ed follows the Norfolk Safeguarding Children Partnership (NSCP) procedures (see [NSCP](#)) when managing concerns. All staff, freelance practitioners and volunteers must act immediately if they are worried about a child. Concerns may arise from a single incident or from a series of observations that together build a picture of risk.

When managing a concern or disclosure:

- listen and support the child
- do not ask leading questions or put words into the child's mouth
- do not stop or interrupt a child who is freely recalling events
- never promise confidentiality – explain that information may need to be shared to help keep them safe
- record promptly what was said, using the child's words where possible
- pass on concerns immediately to the Designated Safeguarding Lead (DSL).

6.2 Recording concerns

All concerns must be recorded without delay using **Elevate-Ed's Safeguarding Concerns Form** (digital). Records must include:

- a clear and comprehensive summary of the concern



- the time and date the concern was raised
- what action was taken, including notification to the DSL
- whether and how the concern was communicated to the commissioner (e.g., home school DSL, local authority officer)
- the outcome, including any next steps agreed.

Records must be signed, dated and stored securely in line with UK GDPR.

6.3 Reporting concerns to the DSL

The DSL (**Aaron Guy**) is the first point of contact for all safeguarding concerns. If the DSL is unavailable and there is a risk of immediate harm, staff may contact CADS directly on **0344 800 8021** (professionals line). The DSL must be informed as soon as possible afterwards.

6.4 Sharing with commissioners

After initial recording, the DSL will ensure concerns are passed without delay to:

- the home school Designated Safeguarding Lead, if the learner is on a school roll
- the commissioning officer at Norfolk County Council (e.g., Transitional Education Service or Virtual School), if placed directly by the local authority
- the Services to Home Educators (SHE) team, if the learner is electively home educated.

6.5 Contacting CADS

The DSL will contact CADS if:

- a child is at risk of significant harm
- consent to share information is not appropriate (e.g., risk to the child, potential to undermine an investigation)
- advice is needed on thresholds or next steps.

△ From August 2025, CADS no longer accepts written referral forms. All referrals must be made by telephone to the professionals line (**0344 800 8021**). CADS will then securely email a written summary of the discussion. Parents or members of the public can contact CADS directly on **0344 800 8020**.

Information to have ready before contacting CADS:

- full details of the child (including DOB, current address, family composition and key contacts)
- the nature of the concern and worries
- relevant family history and significant events
- any support already provided by **Elevate-Ed**
- where the child is currently
- whether parents/carers have been informed (and if not, why).

When considering whether to contact CADS, we will consult the **CADS Flowchart** (see [CADS Flowchart](#) the [Norfolk Continuum of Needs Guidance](#).)



Where safe and appropriate, consent will be sought from parents/carers before contacting CADS. Consent is not required if:

- the child is at risk of significant harm, or
- seeking consent may place the child or another person at risk, or
- it may undermine a police investigation.

6.6 Staff responsibilities

All staff and freelance practitioners must:

- report any concern, no matter how small, and not assume it is insignificant
- follow **Elevate-Ed's** safeguarding reporting process
- record promptly and factually, using the Safeguarding Concerns Form
- escalate if they feel a concern has not been addressed – first to the DSL, then directly to CADS if necessary.

6.7 Children with a social worker

If we have concerns about a child who already has an allocated social worker, these will be reported directly to that worker. If details are not known, staff will contact Norfolk Customer Services on **0344 800 8020** to be connected.

6.8 Early help and ongoing support

Where concerns do not meet the threshold for statutory intervention, **Elevate-Ed** will support Early Help processes in partnership with commissioners, families and agencies. [The Norfolk Continuum of Needs guidance \(2023\)](#) be used to identify levels of concern and ensure a proportionate response.

6.9 Escalation of disagreements

If **Elevate-Ed** disagrees with CADS advice or decisions, the DSL will use the **NSCP Resolving Professional Disagreements Protocol** (see [NSCP](#)). All disagreements will be recorded, including decision-makers, dates and outcomes.

6.10 Direct referral in emergencies

Staff should always follow the reporting procedures outlined in this policy. However, they may share information directly with CADS or the Police if:

- the situation is an emergency, and
- the DSL (or deputy, once appointed) and the proprietor are unavailable.

6.11 Lone Working Where the DSL is the Practitioner

- In some instances, the proprietor and Designated Safeguarding Lead (DSL) (Aaron Guy) will also be the sole practitioner delivering sessions. To ensure accountability and safeguarding integrity in such circumstances, Elevate-Ed applies additional safeguards:
- Independent QA Oversight: The QA Lead (Georgia Guy) provides independent oversight of lone working practice.
- Location & Session Recording: The DSL informs the QA Lead of session location, timings, and any safeguarding disclosures or concerns arising.



- External Accountability: The QA Lead provides reflective challenge and oversight of safeguarding practice, ensuring concerns are recorded and managed in line with Elevate-Ed's Safeguarding Policy.
- Retention of DSL Duties: Oversight by the QA Lead does not transfer or replace statutory DSL responsibilities, which remain with the proprietor/DSL.
- Escalation if Required: Where the DSL is unavailable or requires immediate advice, concerns may be escalated directly to CADS (0344 800 8021, professionals' line) or to the Police in an emergency.

This arrangement ensures that where lone working coincides with the DSL role, there remains an additional layer of safeguarding accountability and oversight

7. Specific Safeguarding Issues

Contextual safeguarding

7.1 Contextual safeguarding

At **Elevate-Ed** we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the setting's environment and/or can occur between children outside of the setting. This is known as *contextual safeguarding*. It is key that all staff, freelance practitioners and volunteers 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.

1. When reporting concerns, staff should include as much information and background detail as possible for the safeguarding lead to report to the home school Designated Safeguarding Lead or other commissioner, to provide a holistic view of the child.

7.2 Children with special educational needs or disabilities (SEND) or health conditions

At **Elevate-Ed** we recognise that children with SEND or certain health conditions can face additional safeguarding challenges such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration



- children with SEND and disabilities being disproportionately impacted by bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.

7.3 Previously looked-after children

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

Child Sexual Exploitation [CSE], Child Criminal Exploitation [CCE]: County Lines and serious violence

7.4

At **Elevate-Ed** we recognise that both CSE and CCE are forms 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 or criminal activity. Whilst age may be the most obvious imbalance of power, it 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 exploitation as well as being physical can be facilitated and/or take place online.

7.5

At **Elevate-Ed** we recognise that CSE is a form of child sexual abuse, and this imbalance of power coerces, manipulates or deceives a child or young person into sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator.

CSE does not always include physical contact and can occur through the use of technology. We understand that some children may not realise they are being exploited, for example, they may believe they are in a genuine romantic relationship.

7.6

At **Elevate-Ed** we understand that CCE is a geographically widespread form of harm that is a typical feature of County Lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market towns 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.

7.7

At **Elevate-Ed** we recognise 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 have been agreed to or consented to. We recognise that the experiences of girls who are criminally exploited can be very different to those of boys, and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

7.8

At **Elevate-Ed**, staff, freelance practitioners and volunteers 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 national guidance including the Home Office's *Preventing youth violence and gang involvement* (see [Home Office, Criminal exploitation of children and vulnerable adults: county lines](#), and the [Children's Society's Preventing Child Sexual Exploitation guidance](#))

7.9

If a child is suspected to be at risk of, or involved in, County Lines, the DSL will ensure the home school Designated Safeguarding Lead or other commissioner is informed immediately.

So-called 'honour-based violence (including Female Genital Mutilation [FGM] and Forced Marriage)

7.10

At **Elevate-Ed** we recognise that our staff, freelance practitioners and volunteers are well placed to identify concerns and take action to prevent children from becoming victims of FGM and other forms of so-called 'honour-based' abuse. We provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of honour-based abuse, they should inform the DSL, who will inform the home school Designated Safeguarding Lead or other commissioner immediately.

7.11

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. Further information on when and how to make a report can be found in the Home Office guidance *Mandatory Reporting of Female Genital Mutilation – procedural information (January 2020)* (see [Home Office FGM](#))

7.12

At **Elevate-Ed** 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, emotional or psychological. The Forced Marriage Unit has statutory guidance and multi-agency guidelines and can be contacted for advice or more information: telephone **020 7008 0151** or email fmufco.gov.uk (see [Forced Marriage Unit](#)).

Preventing radicalisation and extremism

7.13

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

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

Child on child sexual violence and sexual harassment

7.14

At **Elevate-Ed** all staff, freelance practitioners and volunteers 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
- the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery) (see [UKCIS – Sharing nudes and semi-nudes guidance](#))
- initiation/hazing type violence and rituals.



7.15

We recognise that children are vulnerable to physical, sexual and emotional abuse by other children or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all adults remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between children.

7.16

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 that it is just not being reported. We recognise that children may not find it easy to tell staff about their abuse and can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, and this may come from a friend or a conversation that is overheard. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child-on-child abuse, and they will always challenge this. It must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

7.17

At **Elevate-Ed** 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.

7.18

At **Elevate-Ed** 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.

7.19

All staff and freelance practitioners will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child-on-child abuse. The safeguarding lead will notify the home school or other commissioner of any safeguarding concerns in this area without delay.

7.20

In liaison and with the agreement of the home school Designated Safeguarding Lead or other commissioner, we will work with other agencies including the Police and Children's Services as required to respond to concerns about sexual violence and harassment. Where agreed, we will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the



Harmful Sexual Behaviour (HSB) Team. Where appropriate, we will share risk assessments and/or advice from the HSB Team with the commissioner.

7.21

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 the setting whilst safeguarding other children and the victim, delivery of early intervention in respect of HSB and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) where a pupil discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The assault does not have to have taken place in Norfolk, but the victim must live in Norfolk to access support. The SARC also has a 24/7 helpline: **01603 276381**. Referral forms can be found on The Harbour Centre website (see [The Harbour Centre SARC](#)). Any actions should be agreed with the home school Designated Safeguarding Lead or other commissioner.

Modern Slavery

7.22

At **Elevate-Ed** we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, servitude, forced criminality and the removal of organs. We refer to the DfE guidance *Modern slavery: how to identify and support victims* (see [DfE Modern Slavery Guidance](#))

The safeguarding lead will notify the home school or other commissioner of any safeguarding concerns in this area without delay. (see p4).

Safeguarding responses to children who go missing

7.23

At **Elevate-Ed** all staff, freelance practitioners and volunteers should be aware of the safeguarding responsibilities for children who are absent or go missing from the setting, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

At **Elevate-Ed** we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are missing:

- an attendance register is taken at the start of the first session of each day
- attendance (positive attendance, lateness and absences) is reported to the home school/commissioner within 30 minutes of the child's planned arrival
- we hold at least two emergency contact numbers for each of the children who attend our setting wherever possible
- if a child absconds from **Elevate-Ed**, the home school/commissioner and parent/carer will be informed immediately
- staff will alert the safeguarding lead to any concerns raised regarding children who are absent



- children will not be given permission to leave the AP site during the session, unless, for example, it is for a pre-arranged appointment or trip
- any absence concerns will be discussed with the commissioner without delay.

Mental Health

7.24

At **Elevate-Ed** 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.

7.25

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 the safeguarding lead.

The safeguarding lead will notify the home school or other commissioner of any safeguarding concerns in this area without delay. (see p4).

Online Safety

7.26

Online safety includes the use of photography and video, the internet and social media sites, mobile phones and smart watches. At **Elevate-Ed** all staff, freelance practitioners and volunteers 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. In many cases, abuse will take place concurrently online and in daily life. Children can also abuse other children online; this may include abusive, harassing or misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

7.27

At **Elevate-Ed** we ensure online safety is a running and interrelated theme across our policies, induction, training and practice. The following measures are in place:

- **Staff use of personal devices:** Staff, freelance practitioners and volunteers must not use personal mobile phones, smart watches, or other personal devices to take photographs, videos or share information about children. with



prior agreement from the DSL or Founderr, a personal device may be used to capture learner evidence — images/videos must be immediately uploaded to the secure Elevate-Ed Google Drive and deleted from the personal device.

- **Parental consent:** Written consent is obtained from parents/carers via the commissioner (home school or local authority) before any images or videos are taken of children. Consent forms are stored securely in line with our Data Protection Policy. Consent can be withdrawn at any time.
- **Secure storage of images/videos:** All images/videos are uploaded to Elevate-Ed's secure Google Drive safeguarding folder and are accessible only to the DSL and, where appropriate, commissioners. Personal storage is not permitted.
- **Learners online:** Learners may only use devices for supervised educational purposes. All internet access is carried out under direct adult supervision, with appropriate filtering and monitoring arrangements overseen by the DSL.
- **Learners bringing their own devices:** Where a learner brings a personal device, this must be agreed in advance with the commissioner and parent/carer. Personal devices are not used during learning sessions unless explicitly authorised for education.
- **Staff online behaviour:** All staff, freelance practitioners and volunteers must follow the **Staff Code of Conduct** and Acceptable Use Policy (AUP), which prohibit inappropriate online communication with learners and personal use of social media in ways that compromise safeguarding.
- **Visitors and parents/carers:** Visitors, including parents/carers, are not permitted to take photographs or videos during sessions unless explicitly authorised by the DSL and the commissioner.
- **Acceptable Use Agreements:** All staff, freelance practitioners, volunteers and learners are required to sign an Acceptable Use Agreement as part of induction, which sets out safe and appropriate use of technology.

7.28

At **Elevate-Ed** we recognise that technology, and risks and harms related to the internet, evolve and change rapidly. We therefore:

- conduct an **annual review** of online safety practice, supported by a risk assessment that reflects the risks faced by learners in our setting
- embed online safety into our practice and, where relevant, into learner sessions, helping children understand how to stay safe online



- ensure the DSL has overall responsibility for online safety, including filtering and monitoring arrangements, and provides updates through training and staff briefings (see [KCSIE](#))
- keep online safety under review as part of our wider safeguarding and curriculum planning.

Any safeguarding concern relating to online safety will be reported to the DSL and shared with the home school Designated Safeguarding Lead or other commissioner without delay (see p4)

Cybercrime

7.29

At **Elevate-Ed** 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 offline but are enabled at scale and speed online) or *cyber-dependent* (crimes that can only be committed by using a computer).

If there are concerns about a child in this area, the safeguarding lead must notify the home school or other commissioner without delay (see p4).

Domestic Abuse

7.30

At **Elevate-Ed** 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. 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 will signpost victims to this service. Norfolk and Suffolk Victim Care are available to offer support where the threshold for NIDAS support has not been met (see [NIDAS](#); see [Norfolk & Suffolk Victim Care](#)).

If there are concerns about a child in this area, the safeguarding lead will notify the home school or other commissioner **without delay** (see p4).

Children with special educational needs and disabilities or physical health issues

7.31

At **Elevate-Ed** we recognise that children with 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 to be disproportionately impacted by bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges.

7.32

At **Elevate-Ed** we work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring appropriate support for communication is in place.

7.33

At **Elevate-Ed** 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 these children may be vulnerable to.

Children who are lesbian, gay, bi or trans [LGBT]

7.34

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 (2025)* (see [KCSIE](#)), we recognise that these children – and in some cases children who are perceived by other children to be lesbian, gay or bisexual – can be just as vulnerable as children who are.

Therefore, we work to reduce any additional barriers faced and provide a safe space for these children to speak out or share their concerns with members of staff. Through our curriculum and practice, we counter homophobic, biphobic and transphobic bullying and abuse.

If there are concerns about a child in this area, the safeguarding lead will notify the home school or other commissioner **without delay** (see p4).

8. Recording and information sharing

8.1

If staff, freelance practitioners or volunteers are concerned about the welfare or safety of any child at **Elevate-Ed**, they will record their concern using the agreed electronic reporting form (Safeguarding Concerns Form, Appendix 1) accessed via the **Elevate-Ed Portal** (see [Elevate-Ed Portal](#)). Paper copies will not be used to ensure GDPR compliance.



Any concerns must be passed to the Designated Safeguarding Lead (DSL) without delay.

Elevate-Ed will adhere to the following principles of information sharing:

- information sharing must be necessary and proportionate to the circumstances of the child or young person
- the information must be shared quickly and securely
- use clear and precise language
- identify how the information is to be shared
- record exactly what has been shared
- if information is withheld, then that should also be recorded.

When sharing information with any organisation, we will first consider the principles outlined by Government Guidance. We will consult the *7 Golden Rules for Information Sharing* from *Information Sharing Advice for Safeguarding Practitioners* (see [DfE Information Sharing Guidance](#)).

8.2

Any information recorded will be kept securely on Elevate-Ed's Google Drive safeguarding folder, which is access-restricted to the DSL. Child protection information will only be shared within the setting on a strictly "need to know" basis in the child's interests, and with the understanding that it remains confidential.

8.3

Child protection information will be kept up to date. Each concern logged will include:

- a clear and comprehensive summary of the concern and when it was logged
- details of how and when the home school/commissioner was informed
- a note of any action taken, decisions reached and the outcome
- a record of referrals to another agency (e.g., CADS or the Prevent programme), or where referrals were not made, the rationale for this decision.

Safeguarding records will also include:

- a chronology
- a contents front cover
- significant events in the child's life
- invitations to child protection conferences, core groups, and minutes of multi-agency meetings.

8.3a QA Oversight of Lone Working

Where the DSL is also the practitioner delivering provision, Elevate-Ed ensures independent oversight through the QA Lead.

- The QA Lead is notified of session locations and timings.
- Any safeguarding concerns raised in sessions are shared with the QA Lead for reflective oversight.



- The QA Lead reviews safeguarding records to ensure they are accurate, timely, and demonstrate appropriate escalation.
- This oversight strengthens accountability but does not replace the statutory responsibility of the DSL.

8.4

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will all be stored on the child's secure electronic safeguarding file. Each file will include a chronology and contents front cover.

8.5

When a child leaves **Elevate-Ed**, the DSL will make contact with the Designated Safeguarding Lead at the home school and ensure that the child protection file is forwarded securely within 5 days of the placement ending.

8.6

If the child is not on a school roll, **Elevate-Ed** will follow its GDPR/Data Protection Policy and confidentially destroy the safeguarding file when the child reaches their **25th birthday**.

8.7

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 secure electronic transfer.

9. Working with commissioners

9.1

At **Elevate-Ed** we communicate primarily with the home school or commissioner where there are safeguarding concerns.

9.2

Elevate-Ed is committed to working in partnership with home schools, commissioners and parents/carers to safeguard and promote the welfare of children, and to support them to understand our statutory responsibilities in this area.

9.3

When new children join our setting, home schools, commissioners and parents/carers (if the child is home-educated) will be informed that we have a safeguarding policy. A copy will be provided on request and is available on our website (see [Elevate-Ed Website](#)).

Parents/carers will be informed of our legal duty to assist colleagues in other agencies with child protection enquiries and what happens should we have cause to contact the Children's Advice and Duty Service (CADS). Parents/carers will be made aware that we may need to share information with the relevant authorities if we have concerns



about the welfare of their child, and that we do not have to seek consent if there are serious concerns about harm or likely harm to their child.

9.4

We are committed to working with parents/carers positively, openly and honestly. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect parents/carers' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.

9.5

To keep children safe and provide appropriate care for them, **Elevate-Ed** requires commissioners and parents/carers to submit 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/carer to collect the child from the setting (if different from the above).

9.6

Elevate-Ed will retain this information on the child's safeguarding file. Information will only be shared about children with adults who have parental responsibility, or where a parent/carer has given permission and we have been supplied with the adult's full details in writing.

9.7 Pre-placement Safeguarding Assurance

Elevate-Ed will not commence delivery of provision until:

- A Service Level Agreement (SLA) has been agreed in principle by all parties (content reviewed and confirmed), and the safeguarding due diligence process has been completed. The SLA will then be signed once checks are verified.
- Required due diligence checks have been provided to and confirmed by the commissioning school, including:
 - Enhanced DBS status (Update Service)
 - Right to Work in the UK
 - Self-declaration/disclosure of criminal history (where applicable)
 - Confirmation of safeguarding and Prevent training currency
- A learner-specific safeguarding risk assessment has been completed, incorporating information from the commissioner on medical needs, SEND, behaviour plans, and emergency contacts.



If commissioners require additional forms (e.g. staff declaration, emergency contacts, childcare disqualification), Elevate-Ed will complete these once the SLA is agreed in principle but always before sessions begin.

Elevate-Ed will not accept requests to begin provision without these safeguards in place, even if this causes delay. This ensures compliance with **Keeping Children Safe in Education (2025)**, **Working Together to Safeguard Children (2023)**, and Norfolk Safeguarding Children Partnership (NSCP) procedures, and maintains the integrity of safeguarding practice.

Commissioners will be reminded not to inform learners of start dates until all compliance steps are confirmed, to avoid disruption or uncertainty for the child.

10. Child Protection conferences

10.1

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, in order to monitor the safety of the child and the required reduction in risk.

10.2

The home school or commissioner would normally be the education representative at such meetings. However, staff, freelance practitioners or volunteers from **Elevate-Ed** may be asked to attend a Child Protection Conference or Core Group meetings in respect of individual children. Usually, the person representing **Elevate-Ed** at these meetings will be the Designated Safeguarding Lead (DSL). 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.

10.3

All reports for Child Protection Conferences will be prepared in advance using the information and templates available at *How to Raise a Concern | Norfolk Safeguarding Children Partnership* (see [NSCP](#)) under the tab labelled *Child Protection Conferences and Contextual Safeguarding Conferences*.

When completing a chronology, we will refer to the *Multi-Agency Chronologies Practice Guidance Document 2024* and the completed chronology examples, all of which can be accessed at *Norfolk Guidance to Understanding the Continuum of Needs | NSCP* (see [Continuum of Needs](#)) under the *Genogram & Chronologies Resources and Guidance* tab.

The information contained in the report will be shared with parents/carers before the conference where appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at **Elevate-Ed**. In order to complete such reports, all relevant information will be sought from staff working with the child.



11. Safer recruitment

11.1

We will ensure that the proprietor and at least one other senior leader (or QA lead – adapted for Elevate-Ed) have completed appropriate safer recruitment training. At all times the proprietor will ensure that safer recruitment practices are followed, broadly in line with those detailed in Part 3 of *Keeping Children Safe in Education (2025)* (see [KCSIE](#)). At least one person involved in conducting an interview will have received safer recruitment training.

11.2

At **Elevate-Ed** we will use the recruitment and selection process to deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities.

A safeguarding question is included as part of all structured interviews.

11.3

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.

11.4

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

We will undertake Disclosure and Barring Service (DBS) checks on all staff, freelance practitioners, volunteers and QA oversight leads to ensure we are recruiting and selecting the most suitable people to work with children. We will renew these checks every 3 years – in line with Elevate-Ed's Safer Recruitment Policy.

11.5

We will maintain a Single Central Record (SCR) of all safer recruitment checks



carried out, in line with recommendations from *Keeping Children Safe in Education (2025)*. The proprietor will check the SCR regularly to ensure that it meets statutory requirements.

11.6

At **Elevate-Ed** 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 challenging inappropriate behaviour.

11.7

As per paragraph 334 of *Keeping Children Safe in Education (2025)*, we will ensure that written confirmation is provided to all home schools and commissioners that appropriate safeguarding checks have been carried out on our staff — i.e., those checks that the school would otherwise perform in respect of its own staff. Appendix 4 provides a sample form for this purpose. Appendix 4 also provides a checklist for the suggested organisation of staff files.

12. Safer Working Practice

12.1

All adults who come into contact with learners at **Elevate-Ed** 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.

12.2

All staff, freelance practitioners and volunteers will be provided with a copy of the **Staff Code of Conduct** at induction. They will be expected to know our Code of Conduct and carry out their duties in accordance with this advice.

12.3

If staff, freelance practitioners or volunteers are working with children alone, they will, wherever possible, be visible to other adults. They will be expected to inform another member of staff of their whereabouts, who they are with, and for how long. Where sessions are delivered in hired or community spaces, visibility and accountability arrangements must be agreed with the DSL.

12.4

Guidance about acceptable conduct and safe practice will be given to all staff, freelance practitioners 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 the *Safer Recruitment Consortium – Guidance for safer working practice for those working with children and young people in education settings (February 2022)* (see [Safer Recruitment Consortium](#)).



All adults 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.

12.5

Please refer to **Elevate-Ed's Lone Working Policy** and/or safeguarding procedure for carrying out home visits and/or sessions in community spaces, as applicable.

13. Managing allegations against staff and volunteers

13.1 Allegations that may meet the harms threshold

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

13.2

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 that 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)* (see [Working Together](#)) and *Keeping Children Safe in Education (2025)* (see [KCSIE](#)).

An allegation may relate to a person who works or volunteers with children who has:

behaved in a way that has harmed a child, or may have harmed a child; and/or possibly committed a criminal offence against or related to a child; and/or

behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or

behaved or may have behaved in a way that indicates they may not be suitable to work with children.

13.3

The fourth bullet point above recognises circumstances where a member of staff is involved in an incident outside of **Elevate-Ed** which did not involve children but could have an impact on their suitability to work with children; this is known as *transferable risk*.

13.4

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



13.5

We will take all possible steps to safeguard children and to ensure that the adults in our setting are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in the local protocol *Allegations Against Persons who Work with Children* (see [NSCP Allegations Protocol](#)) and Part 4 of *Keeping Children Safe in Education (2025)* are adhered to. We will seek appropriate advice.

The first point of contact for settings regarding concerns and/or allegations is via the Local Authority Education Duty Desk on **01603 307797**. A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service, then the LADO referral form should be completed and sent via email to **LADO@norfolk.gov.uk**.

13.6

If an allegation is made or information is received about any adult who works or 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 proprietor immediately. Should an allegation be made against the proprietor, this will be reported to the QA Lead (or, where applicable, the Chair of Trustees).

13.7

The proprietor will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

13.8

Any member of staff, freelance practitioner or volunteer who does not feel confident to raise their concerns with the proprietor should contact the LADO directly via **lado@norfolk.gov.uk**.

13.9

Further information and guidance documents in relation to the LADO process, forms, leaflets and the *Allegations Against Persons who Work/Volunteer with Children* procedures are found on the Norfolk Safeguarding Children Partnership website (see [NSCP](#))

Further national guidance can be found at *Advice on whistleblowing* (see [GOV.UK Whistleblowing Advice](#)). 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 available 8:00am–8:00pm, Monday to Friday) or email help@nspcc.org.uk (see [NSPCC Whistleblowing Helpline](#)).

13.10 Referral to the Disclosure and Barring Service (DBS)

Elevate-Ed has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left.

The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at **Elevate-Ed**, 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. If guidance is needed on making a barring referral, we will contact the East of England DBS Outreach Advisor for support.

In the case of a teacher employed by **Elevate-Ed**, we will also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if the teacher is dismissed or ceases to provide services because of serious misconduct or might have been dismissed/ceased had they not left first.

13.11 Concerns that do not meet the harm threshold

The term '*low-level concern*' does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harms thresholds set out above. In Norfolk, the *low-level concern* process is to consult with the Local Authority Education Duty Desk on **01603 307797**.

At **Elevate-Ed** we recognise a low-level concern to be something which is:
inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
Examples of such behaviour could include:
being over-friendly with children
excessive 1:1 attention beyond what is required for the role
having favourites
adults taking photographs of children on their personal mobile phone
unmonitored engagement with a child on a one-to-one basis in a secluded area
using inappropriate, sexualised, intimidating or offensive language
inappropriate sharing of images



humiliating children.

This list of examples is not exhaustive, and low-level concerns can arise from various forms of behaviour.

13.12

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

13.13

At **Elevate-Ed** staff, freelance practitioners and volunteers report all low-level concerns to the safeguarding lead or to the proprietor. If reported to the safeguarding lead, they will inform the proprietor, who will always be the ultimate decision-maker in respect of all low-level concerns.

13.14

Through training and induction, we ensure that all staff, freelance practitioners and volunteers 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 falls below expected professional standards.

13.15

At **Elevate-Ed** we understand the importance of recording low-level concerns and the actions taken in light of these being reported. Records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and take action when needed. This could be through a disciplinary process but also by referring to the Local Authority Education Duty Desk on **01603 307797**.

Please note: where a child, parent/carer or staff member makes an allegation of harm, this will not be considered a *low-level concern* without consultation with the Local Authority Education Duty Desk or the LADO service directly.

13.16

We recognise that low-level concerns should not be included in references unless they relate to issues which would normally be included (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 is found to be substantiated, it should be referred to in a reference.



14. Relevant policies and guidance

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

- Staff Code of Conduct
- Anti-Bullying Policy (within Behaviour & Relationships)
- Behaviour & Relationships Policy
- Safer Recruitment Policy
- Health & Safety Policy
- Complaints & Grievance Policy
- SEND Policy
- Equality, Diversity & Inclusion (EDI) Policy
- Lone Working Policy
- Staff Training & Development Policy
- Risk Assessment Policy
- Data Protection & Privacy Policy (covers confidentiality & information sharing)
- Whistleblowing Policy

14.2 This policy makes reference to the following publications

[8.3 Allegations Against Persons who Work/Volunteer with Children - Norfolk Safeguarding Children Partnership \(norfolkscb.org\)](#)

[Alternative provision - GOV.UK \(www.gov.uk\)](#)

[Independent school registration - GOV.UK \(www.gov.uk\)](#)

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)

[Keeping children safe in out-of-school settings: code of practice - GOV.UK \(www.gov.uk\)](#)

[Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](#)

[Policies and Procedures - Norfolk Safeguarding Children Partnership](#)

[Working together to improve school attendance - GOV.UK \(www.gov.uk\)](#)

[Working together to safeguard children - GOV.UK \(www.gov.uk\)](#)

[Norfolk Guidance to Understanding Continuum of Needs | NSCP | PWWC \(norfolkscp.org.uk\)](#)



Norfolk County Council



Safer
Norfolk Safeguarding
Children Partnership



Appendix 1

Draft Recording Form for Safeguarding Concerns

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

Information Required	Enter Information Here
Full name of child	
Date of birth	
Home school/commissioner/home-educated	
Your name and role	
<p>Nature of concern/disclosure</p> <p><i>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</i></p> <p><i>Ensure that if there is an injury this is recorded (size and shape) and a body map is completed</i></p> <p><i>Make it clear if you have a raised a concern about a similar issue previously</i></p>	
Time & date of incident:	
Your Signature	
Time and date form completed	



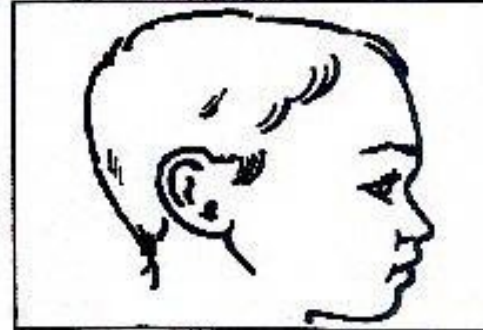
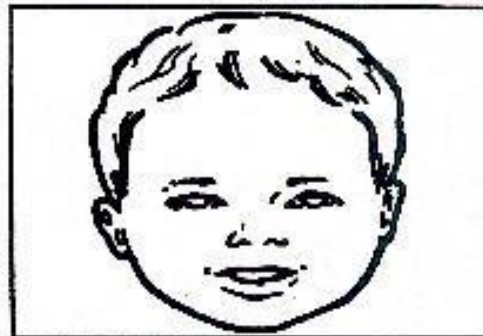
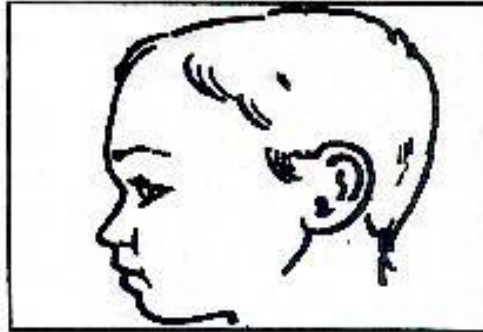
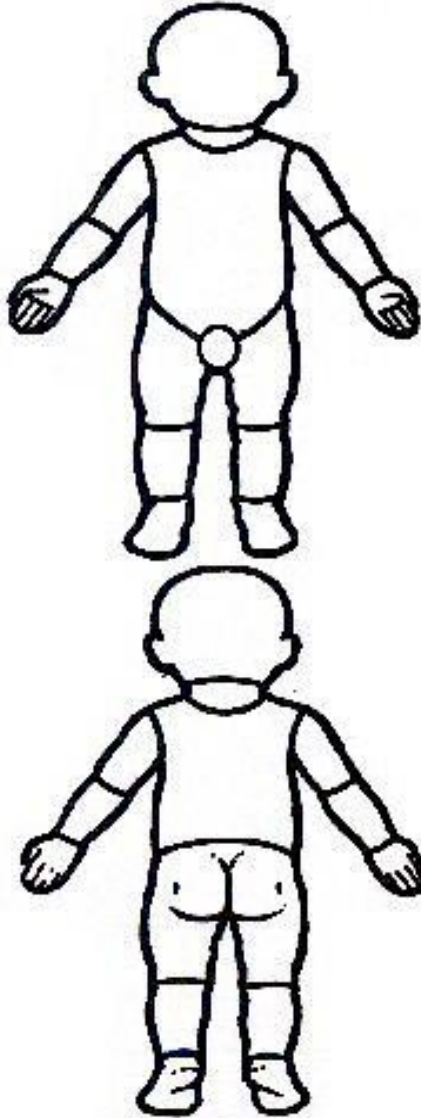
Information Required	Enter Information Here
Time and date form received by safeguarding lead	
Time and date form forwarded to home school/commissioner/Services to Home Education	
Key contact at home school/commissioner/Services to Home Education	Name Role Email telephone
Additional actions taken by safeguarding lead	
Referral made to police [yes/no, date and time]	
Referral made to CADS [yes/no, date and time]	
Referral Made to Other Agency [yes/no, date and time, name of organisation]	
Parents/carers informed [yes/no, date and time]	
Feedback given to child [yes/no, date and time]	
Feedback given to person who recorded disclosure [yes/no, date and time]	
Further action agreed	
Full name of safeguarding lead	



Information Required	Enter Information Here
Signature of safeguarding lead	
Date of signature	



Body Map
Young Child

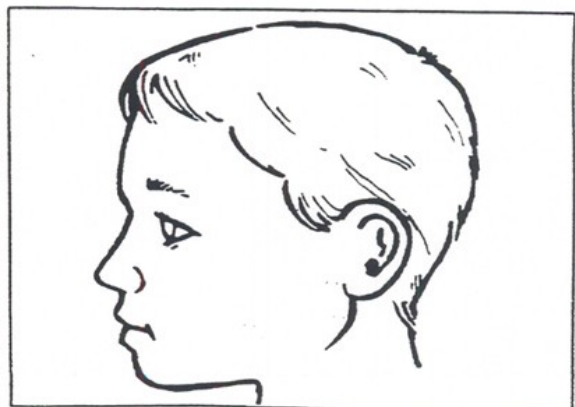
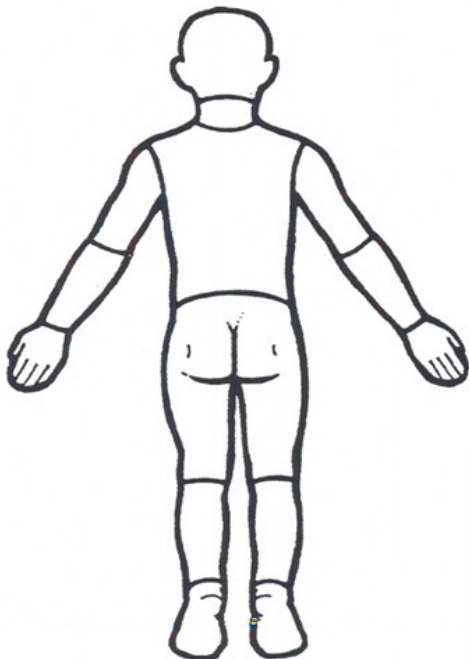
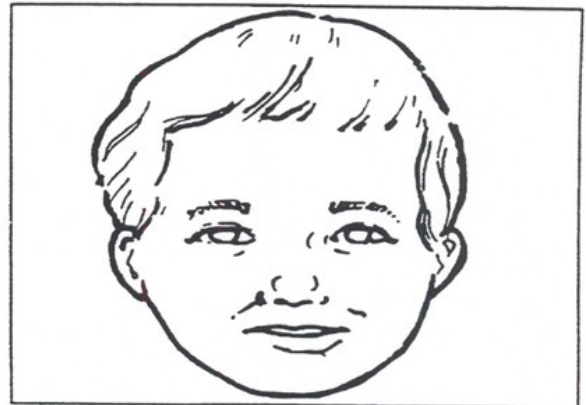
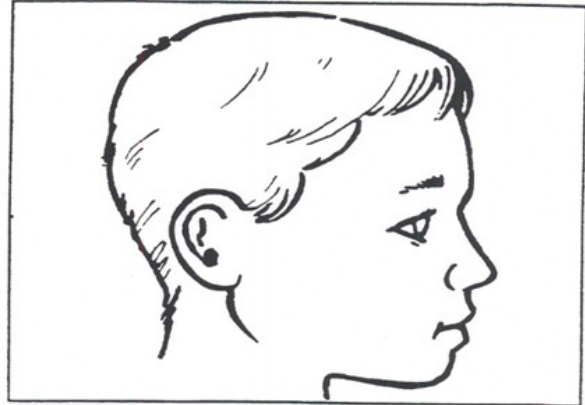
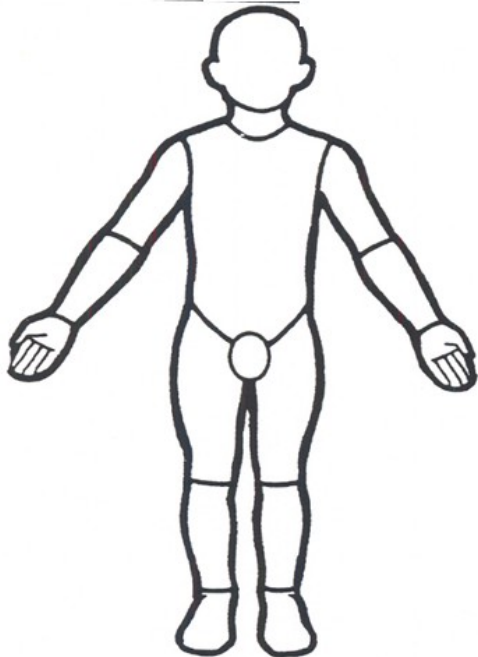


Indicate clearly where the injury was seen and attach this to the referral form

Body Map



Older Child



Indicate clearly where the injury was seen and attach this to the referral form.



Appendix 2

Safeguarding Induction Sheet for new staff and regular visitors or volunteers.

We all have a statutory duty to safeguard and promote the welfare of children, and at Elevate-Ed we take this responsibility seriously.

If you have any concerns about a child in our setting, you must share this information immediately with our Safeguarding Lead or one of the alternate post holders.

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

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated professionals detailed below and provide them with a written record of your concern. A copy of the form to complete is attached to this and others can be obtained from the following link – [Safeguarding Form](#) or email safeguarding@elevate-ed.org.uk to request a form.

Please ensure you complete all sections as described.

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

Any allegation or low-level concern about a member of staff, a child's foster carer or a volunteer should be reported immediately to the safeguarding lead. If an allegation is made about the proprietor you should contact the Local Authority Duty Desk on 01603 307797.

[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 at *Elevate-Ed* are:

Safeguarding Lead: Aaron Guy
Email: Safeguarding@elevate-ed.org.uk
Contact Number: 07534 765292

Deputy Safeguarding Lead:
Email
Contact Number:



Appendix 3

Children's Advice and Duty Service [CADS]

The CADS Practice Flowchart and CADS FAQs can be accessed here:

[How to Raise a Concern | Norfolk Safeguarding Children Partnership | PWWC](#)

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

1. Can you evidence that the child is experiencing or likely to suffer significant harm?

a. YES

- i. Have you spoken to the family/young person regarding your reasons for contacting CADS?
- ii. Inform the parents and/or gain their consent for you to make this contact unless doing so would put the child at immediate risk of harm.
- iii. Do you have the consent of the parent/carer/young person to make contact with CADS or have you informed them of your intention to do so?
- iv. Gather all the family's details including dates of birth, current address, current and working contact details and family composition, along with the history and current worries.
- v. Call CADS on the professionals only phone line 0344 800 8021 to have a discussion with a Consultant Social Worker. A copy of the discussion will be securely emailed to you. Follow the advice given by the Consultant Social Worker.

b. NO

- i. Have you discussed the child's needs with your safeguarding lead or your line manager?
- ii. Discuss the child with your safeguarding lead or line manager if available and follow their advice when providing support to the family.
- iii. Speak to the commissioning school or local authority about setting up an EHAP with the child and their family.
- iv. Speak to the parents and the child about your worries and discuss with them how your agency can help and support the children and family. You could carry out an EHAP or seek Early Help support. Seek guidance on this from the commissioning school or LA first. Follow the Early Help guidance on the NSCP website.
- v. Where you have carried out an EHAP which has been reviewed and amended as required – and the child's needs are not being met or in fact have increased, gather the information requested in this form, seek consent from the parent carers and then contact CADS.

2. Keep a record for your own setting's recording process

The contact number for parents, carers and members of the public is 0344 800 8020.

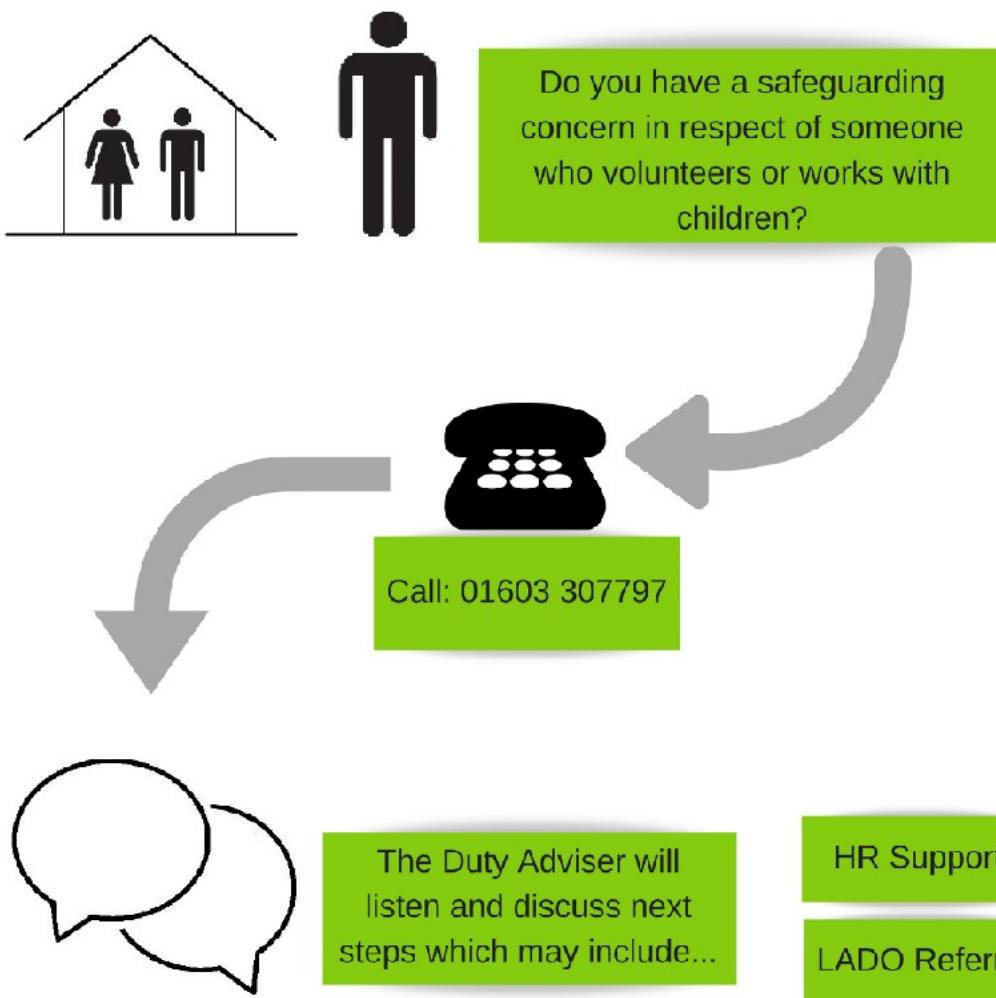
Appendix 4



Guidance for Schools, Colleges & Alternative Education Providers

Education Quality Assurance & Intervention Service

Duty Desk



Appendix 5

Unregulated alternative provider safer recruitment checks

As per [Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)



168. Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the pupil's needs.

169. The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Therefore [name of school] is obliged to obtain written confirmation of the following (according to Part 3 of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)) Prior to any placement being agreed, the following must be completed by the AP centre lead or proprietor, signed and returned to the school. Failure to complete this form may result in placements being paused or ceased and funding withdrawn.

Name of provision	
Address of provision	
Proprietor/centre lead name/role	
Proprietor/centre lead contact telephone and email	
Name and role(s) of colleagues who are safer recruitment trained	
Date of safer recruitment training	

I, the undersigned, confirm that in respect of all employees and volunteers at the above named unregulated alternative provision, the following checks and procedures are in place and affirm that all staff are suitable to work with children. I understand that the school may request sight of relevant documents during a pre or mid-placement visit.



1. **Staff files** are in place and contain evidence of
 - a. Application forms containing
 - i. personal details (current and former names, current address and national insurance number)
 - ii. details of their present (or last) employment and reason for leaving
 - iii. full employment history
 - iv. qualifications
 - v. details of at least 2 referees
 - vi. a statement of personal qualities and experience
 - b. A self-declaration of any criminal record or information which may make them unsuitable to work with children
 - c. Evidence of right to work in the UK
 - d. Photocopies of 2 identity checks (with a photograph)
 - e. At least 2 references, including 1 from the applicant's current or most recent employer
 - f. A risk assessment as required
 - g. Copies of interview notes which determine the applicant's suitability to work with children
 - h. Photocopies of qualifications
2. **Staff tracker or single central record** which includes:
 - a. Name and address of employee/volunteer
 - b. Date employment started
 - c. Date identity checks carried out and by whom
 - d. Date DBS checked and by whom
 - e. Risk assessment in place yes/no
 - f. Right to work in the UK checks – when and by whom
 - g. Qualifications check – when and by whom
 - h. Prohibition order checks- when and by whom (for those in 'teaching activity')

Signed	
Date	
Received by school (name/date)	