

SAFEGUARDING POLICY FOR UNREGISTERED ALTERNATIVE PROVISION INCORPORATING CHILD PROTECTION

ALPHA INCLUSION AND COMMUNICATION

Review date	19.09.24
Date of next review	01.08.25 (to be reviewed annually or earlier if required)
Reference number	CCC190924 Safeguarding Policy
Name of reviewers	Claire Chadderton and Sarah Matthews
Amended and reason	Amended 19.09.24 by CC to reflect additional staffing and updated Safer Partner Membership

Policy Consultation & Review

This policy is on our website and is available on request from info@alphainclusion.co.uk We provide commissioners with this policy during pre-placement planning, and we also inform parents and carers about this policy when their children and young people join our sessions.

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

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

All team members receive training on safeguarding procedures at Alpha Inclusion and Communication (AlphaIC) on joining the company. An annual update is provided in September. In addition, all team members are provided with [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#) team members 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 Safeguarding and Compliance Guardians on an annual basis. This policy was last reviewed on 16.09.24.

Signature *C. Chadderton* (Safeguarding Guardian & Designated Safeguarding Lead) Date: 19.09.24

Signature *S. Matthews* (Compliance Guardian and Creative Administrator and Facilitator) Date: 19.09.24

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1. Key contacts

Name	Role	Email	Telephone
Claire Chadderton	Designated Safeguarding Lead and Safeguarding Guardian	safeguarding@alphainclusion.co.uk	07483414744 or (01603) 926170
Ricci Butler	Alternate Designated Safeguarding lead	safeguarding@alphainclusion.co.uk	07483414811 or (01603) 926170
Deanna Mason	Alternate Designated Safeguarding lead	safeguarding@alphainclusion.co.uk	07483414728 or (01603) 926170
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 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.**

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

- is on a school roll, contact the DSL at the home school
- is under the remit of the [Alternative Education Service \(Section 19 team\) - Schools \(norfolk.gov.uk\)](#), contact the relevant adviser/key contact and cs.educationalprovision@norfolk.gov.uk as outlined in their policy
- 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 Alpha Inclusion and Communication's safeguarding policy is to provide a secure framework for safeguarding and promoting safeguarding for all who attend our sessions, or associated persons who we come into contact with.

The policy aims to ensure that:

- all our children, young people and adults are safe and protected from harm.
- protecting children, young people and adults from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children, young people and adult's mental and physical health or development
- ensuring that people grow up in circumstances consistent with the provision of safe and effective care

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- 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.
- other elements of provision and policies are in place to enable children, young people and adults to feel safe and adopt safe practices.
- team members, young people, visitors, volunteers and parents are aware of the expected behaviours and the organisations legal responsibilities in relation to the safeguarding and promoting the welfare of all of our children, young people and adults.

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

2.3 Alpha Inclusion and Communication fully recognises the contribution it can make to protect children from harm and supporting and promoting 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, team members, commissioners, parents and carers, and visitors.

3. Company ethos

3.1 At Alpha Inclusion and Communication (AlphaIC) we recognise that the welfare of children, young people and adults are paramount and that they have equal rights of safeguarding. All organisations that work or come into contact with children, young people, adults and/or adults at risk need to have safeguarding policies and procedures in place. Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people adults and/or adults at risk can also abuse and that such incidents fall into the remit of this policy. We have a duty of care and will do everything we can to provide a safe and caring environment whilst they attend our activities and work alongside our team members and organisation. All team members 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 team members at our organisation play an important role as they are able to identify concerns and provide help to prevent concerns from escalating. **All team members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, young person or adult, team members and volunteers should always act in the interests of those to whom the concern relates and have a responsibility to take action, as outlined in this policy, and without delay. Team members must always act in the **best interests** of the person.

3.3 At AlphaIC we ensure that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child, young person and adult at risk at heart. We aim at all times to attain best safeguarding practice throughout all of our activities with children, young people, and adults. We endeavour to provide a safe and friendly environment and celebrate all achievements. We will achieve this by adhering strictly to this policy, guidance and risk assessments. AlphaIC also holds current **Public Liability Insurance** which covers all of our activities.

3.4 Where there is a safeguarding concern, a child, young person or adult at risks 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,

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easily understood and easily accessible for persons to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Our systems are designed to ensure that schools and other commissioners, such as the local authority, are informed **without delay** where there is a safeguarding concern.

3.5 All team members and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a 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 team members will be trained to recognise that victims may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. At all times we will work in partnership and endeavour to establish effective working relationships with schools, other commissioners, parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children](#) and the [Norfolk Multi Agency Safeguarding Partnership arrangements](#).

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

3.7 AlphaIC 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 AlphaIC will be assured
- Pupil-specific risk assessment
- Emergency contact details for the pupil
- Key medical information

Additional guidance on pre-placement procedures is available at [Unregulated alternative provision templates - Schools \(norfolk.gov.uk\)](#)

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

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

This means we do not unlawfully discriminate against anyone 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 AlphaIC has a team of Designated Safeguarding Leads that work together to ensure that all safeguarding issues raised by practitioners and wider team members are effectively responded to, recorded, and referred to the

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appropriate agency. DSL availability is communicated to team members in advance and, if for any reason the named DSL is unavailable (sickness, training, outreach commitments), AlphaC team members shall be informed of this amendment at the earliest opportunity and another DSL from the designated safeguarding team shall be available.

The AlphaC Safeguarding team includes the following team members;

The **Designated Safeguarding Lead (DSL) and Safeguarding Guardian for AlphaC** is: Claire Chadderton

AlphaC Alternate Designated Safeguarding Leads (DSLs) are: Ricci Butler and Deanna Mason

Our central safeguarding mailbox is: safeguarding@alphainclusion.co.uk

Alpha Inclusion and Communication is responsible for ensuring;

- all team members carry out all the requirements of this policy
- all team members work in a way that will safeguard and promote the welfare of all children, young people and adults attending our services
- all team members receive appropriate safeguarding induction on appointment
- all team members are adequately trained to carry out safeguarding duties
- all team members maintain timely and detailed records of safeguarding
- the safeguarding leads have sufficient time to carry out their duties
- this policy is reviewed and updated annually
- all team members read and sign annually to say they have read and understood Part One of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/keeping-children-safe-in-education) procedures are in place for dealing with allegations against members of team members
- 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 to AlphaC 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 reception)
- DSL's have a role and responsibility to ensure that safeguarding training for all team members takes place once a year and for arranging safeguarding training for all team members, including volunteers who work with children, young people and adults in our holiday sessions and as part of our induction process.

4.2 The **Designated Safeguarding Lead and Alternate Designated Safeguarding Leads at AlphaC** are responsible for ensuring;

- schools and commissioners are informed 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 Compliance Guardian and Safeguarding lead(s) are advised to sign up to [Norfolk Schools](https://www.norfolk.gov.uk/schools) Ecourier to receive weekly Management Information [MI] sheets. These often contain safeguarding updates for schools and may be of value to unregistered AP settings.

5. Training and induction

5.1 When new team members join AlphaIC they will be informed of the safeguarding arrangements in place. All team members will annually be given a copy of this safeguarding policy, the **Staff Code of Conduct, Behaviour policy** and **Part One of Keeping children safe in education - GOV.UK (www.gov.uk)**. All team members are expected to read these key documents and sign a log to record that all have been read and understood. They will also be provided with contact details for the safeguarding lead(s) and information about how to record and report safeguarding concerns.

5.2 All team members will have access to safeguarding training annually and all new team members during their induction period will receive safeguarding training. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record concerns, the processes for referral to Children's Services and the remit of the safeguarding lead. The induction will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Team members will also receive online safety training, including understanding the expectations, applicable roles, and responsibilities in relation to filtering and monitoring as this is part of the overarching safeguarding approach of our setting and shall also be expected to complete an online Safeguarding Training course run by an external provider (SAFE CIC) within two-weeks of joining the AlphaIC team.

Within two weeks of joining the team, all team members will be given access to the **Safeguarding Policy and Part one of 'Keeping Children Safe in Education (2024)** and will meet with our Safeguarding Guardian and be informed as to our Alternate Designated Safeguarding Leads are. Team members shall also have time allocated as part of their induction to meet directly with specific Guardians whom can support them. Through training provided by our Safeguarding Guardian they will also be provided with information about how to record and report safeguarding concerns **'Recording form for Safeguarding Concerns' (Form BCC240524)** and the **'Safeguarding Information for staff and regular visitors' (Form BCC230524)** which contains a flowchart providing a visual of our safeguarding process and procedures. Access to additional associated policies shall also form part of our induction process. All team members are expected to read these key documents.

5.3 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist team members to understand and discharge their role and responsibilities as set out in **Part One of Keeping children safe in education - GOV.UK (www.gov.uk)**. In order to achieve this, we will ensure that:

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

All regular visitors, temporary team members and volunteers to AlphaIC will be given a set of our safeguarding procedures; they will be informed of whom our Safeguarding Guardian and Alternate DSLs are and what the recording and reporting system is. **(Form BCC230524)**

Our Designated Safeguarding Lead and Alternate DSLs will undertake further safeguarding training in addition to the whole team members training. This will be undertaken at least every two years which updates their awareness and understanding of the impact of the wide agenda of safeguarding issues. This will support them to ensure that our safeguarding arrangements are robust and with the aim of achieving better outcomes for the children, young people and adults with whom we work. This includes taking part in multi-agency training in addition to safeguarding training.

The Safeguarding Guardian and Alternate DSLs will attend Designated Safeguarding Lead (DSL) training provided by the Local Authority every two years. The Safeguarding Guardian and Alternate DSLs will attend one of the multi-agency training courses organised by Norfolk Safeguarding Children's Partnership at least once every three years. In addition to formal training, all DSLs will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role. This will be achieved through accessing the Norfolk Safer Partnership, Safe CIC, NSCB and NSPCC e-courier updates and disseminating national and local updates to team members.

All team members complete PREVENT training and FGM training annually. Non-student-facing team members (e.g our Finance Guardian), will complete this bi-annually in line with government recommendations due to their non-direct role working with children. If at any point the Finance Guardian is to be working directly with young people they will be supervised at all times and shall inform the Safeguarding Guardian and/or Alternate DSLs prior to, and following this event to receive specific updates and training that may be pertinent to the work in which they are conducting (e.g observations, practitioner support etc).

We have a clear induction and training strategy with clear job descriptions and responsibilities and all relevant procedures. All new team members, paid and unpaid, will receive induction training as soon as possible and sign to record they have:

- received and understood this policy.
- been given any relevant resources
- understood the commitment to safeguarding training

When needed, team members will receive further safeguarding training, at the appropriate level, as soon as possible. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Leads (DSLs). The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Team members will also receive online safety training, including understanding the expectations, applicable roles, and responsibilities in relation to filtering and monitoring as this is part of the overarching safeguarding approach of our organisation.

We actively encourage all of our team members to keep up to date with the most recent local and national safeguarding advice and guidance and [Annex B of 'Keeping Children Safe in Education' \(2024\)](#) provides links to guidance on specific safeguarding issues such as Child Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via the [Norfolk Safeguarding Children Partnership](#) and within the [Safeguarding Section](#) of the [Norfolk Schools and Learning Providers website](#). As a commitment to maintaining up to date knowledge and local and national safeguarding advice and guidance Alpha Inclusion and Communication is also a member of the [Norfolk Safer programme](#) and member of [SAFE CIC \(Safe Activities For Everyone, CIC\)](#).

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

5.5 Our board of trustees will also undertake appropriate training to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective

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and support the delivery of a robust approach to safeguarding at AlphaIC. Our Board of Trustees receive regular updates from our Safeguarding Guardian and training takes place at induction and is updated regularly.

6. Procedures for managing concerns

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

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

6.3 It is *not* the responsibility of AlphaIC team members or volunteers to investigate welfare concerns or determine the truth of any disclosure or allegation. All team members and volunteers do, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy. **All concerns should be reported without delay and recorded in writing using the agreed procedures outlined in this policy.**

6.4 If team members, including volunteers, are concerned that a child, young person or adult may be at risk, or is actually suffering abuse, they should tell the Designated Safeguarding Lead or Deputy Person for Safeguarding based in the person's school immediately. They should follow the Safeguarding Policy of the host school and concerns must be recorded, dated and signed or added directly to the schools online system if used and in line with the school's policy. If AlphaIC team members are unable to report the concerns to the DSL or Deputy Safeguarding Person detailed in the contract, the matter should be brought to the attention of the most senior member of staff on site.

6.5 All concerns about a child or young person should be reported **without delay** and recorded in writing using the agreed system in the setting (see [Appendix 1](#)).

All completed forms should be signed, dated and given direct to the commissioning DSL or Deputy DSL, logged on to the schools online system, or sent by encrypted email, to the DSL at the school before leaving the site or by 3.30pm the same day if it is not possible to hand over information directly. An Alpha DSL must also be notified by 3.30pm at the latest on this same day.

Records should include:

- a clear and comprehensive summary of the concern
- the time and date that the concern was communicated to the home school/commissioner
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

The name and role of the school staff member who received the report should be documented and, upon receipt of a safeguarding concern the AlphaIC DSLs should document the action taken in the encrypted DSL log.

If an AlphaIC team member reports a concern(s) to a school, they should request an update on action taken from the school's DSL within two working days of the report and confirmed actions gathered before the next planned session. AlphaIC DSL's must also remain updated.

6.6 Following receipt of any information raising concern, the safeguarding lead will pass this on **without delay** to:

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

6.7 If, at any point, there is a **risk of immediate serious harm** to a child a referral should be made to [Children's Advice and Duty Service \(CADS\)](#) immediately on **0344 800 8021**². Anyone can make a referral in these circumstances. If the child's situation does not appear to be improving the team members member with concerns should press for re-consideration by raising concerns again with the safeguarding lead. Concerns should always lead to help for the child or young person at some point.

6.8 Team members should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Norfolk Children's Advice & Duty Service, Norfolk Safeguarding Adults Board or the police if:

- the situation is an emergency and the safeguarding lead, alternate leads and/ or Founder/Director are unavailable
- they are convinced that a direct report is the only way to ensure the person's safety.

If this will affect subsequent sessions or meetings, all team members can contact the AlphaIC base or any other team member to support them in cancelling prior arrangements.

6.9 Any team member who does not feel that concerns about a child or young person have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Founder/Director. If any team member does not feel the situation has been addressed appropriately at this point should contact [Children's Advice and Duty Service \(CADS\)](#) directly with their concerns.

7. Specific Safeguarding Issues

7.1 Safeguarding is not just about protecting persons from deliberate harm. For our service it includes such things as persons safety, bullying, racist abuse and harassment, educational visits, intimate care, attendance, and online safety etc. The witnessing of abuse can have a damaging effect on those who are party to it, as well as the person subjected to the actual abuse, and, in itself, will have a significant impact on the health and emotional well-being of the person.

Abuse can take place in any family, institution, or community setting, by telephone or on the internet. Abuse can often be difficult to recognise as people may behave differently or seem unhappy for many reasons as they move through the stages of childhood, adolescence and into and through adulthood or as their circumstances change. However, it is important to know the indicators of abuse and to be alert to the need to consult further. The following list is for guidance only. It is important to be observant, listen to what is being said and record. e.g. is what you are observing

¹ Education other than at school

² Note: this telephone number is only for professionals working with children. 0344 800 8020 should be used by members of the public.

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and being told about an injury consistent with the injury? The table below provides possible signs and indicators of abuse and is not an exhaustive list. Additional information related to these signs and indicators can be found in **Appendix 7** of this document, and the following table below this policy details signs and indicators pertinent to the work of AlphaIC.

<ul style="list-style-type: none"> Abuse related to faith or belief Alcohol and Substance misuse Breast Ironing Carrying offensive weapons Child criminal and sexual exploitation including County Lines Child on child abuse, including sexual violence and upskirting Concealed pregnancy Criminal exploitation Disguised compliance Discrimination 	<ul style="list-style-type: none"> Domestic abuse, including Honour based abuse Emotional Exploitive use of technology Female Genital Mutilation (FGM) Financial or material abuse Forced marriage Gangs Gambling Hate and "mate" crime Hazing and initiation rites Hoarding 	<ul style="list-style-type: none"> Modern slavery Neglect and acts of omission Online safety Organisational or institutional abuse Psychological Physical abuse Radicalisation Self-neglect Sexual Trafficking
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Contextual safeguarding

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

7.3 We recognise that persons with special educational needs and/or disabilities (SEND) **or certain health conditions** can face additional safeguarding challenges and these are discussed in team member training. These additional barriers can include:

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

AlphaIC will ensure that all children, young people and adults are listened to and responded to appropriately where they have concerns regarding abuse. In order to do this we will ensure that our team members receive the relevant training to raise awareness and have access to specialist support and signposting if they have concerns regarding abuse of a person with Special Educational Needs and/or disabilities.

7.4 At AlphaIC we recognise that a **previously looked after child** or young person potentially remains vulnerable and all team members should have the skills, knowledge and understanding to keep previously looked after children and

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young people safe. When dealing with looked after children and previously looked after children and young people, it is important that all agencies work together, and prompt action is taken when necessary to safeguard this particularly vulnerable group.

Norfolk's Virtual School for Children in Care and Previously in Care, and Children with a Social Worker is part of the Family Help and High Needs Service. It has a remit and aspiration to improve educational outcomes and experiences of children in care who are in education from Early Years to the end of Year 13. At AlphaIC we will support the Virtual school in it's role outlined in the [Children and Social Work Act 2017](#) to monitor attendance, and track progress and attainment for those Norfolk children accessing our services whom are in care, previously in care, adopted/ adoption, Special Guardianship Orders (SGO's), Guardianship Orders (GO's), Gypsy Roma Traveller (GRT) and English as an Additional Language (EAL). This will occur through following attendance procedures outlined previously and providing feedback to commissioners which can be shared with the Virtual School in line with agreed contracts. 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

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

7.6 At AlphaIC we recognise that Child Sexual Exploitation is a form of child sexual abuse and this imbalance of power coerces, manipulates or deceives a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. Child sexual exploitation does not always include physical contact, it can also occur through the use of technology. We understand that some children and young people may not realise they are being exploited e.g. they may believe they are in a genuine romantic relationship.

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

7.8 We understand that children, young people and adults at risk 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 and young people as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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7.9 AlphaIC team members are aware of the indicators and risk factors which may signal a child, young person or adult is vulnerable to, or involved with, serious violent crime. We make reference to the Home Office's PREVENT duty [Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information. If a child, young person or adult is suspected to be at risk of or involved in county lines, a referral to the Children's Advice and Duty Service (CADS) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

7.10 If a child is suspected to be at risk of or involved in county lines, the home school or other commissioner will be informed **immediately**.

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

7.11 At AlphaIC we recognise that our team members are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other abuse often referred to as 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. If team members have a concern regarding a child that might be at risk of HBV, they should inform the young persons designated DSL along with an Alpha DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care (see page 4).

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

7.13 At AlphaIC we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. [The Forced Marriage Unit has statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information: Contact [020 7008 0151](tel:02070080151) or email fm@fco.gov.uk

Preventing radicalisation and extremism

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

- Through training, team members, volunteers and our Board of Trustees have an understanding of what radicalisation and extremism is, why we need to be vigilant in our roles 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** (see p4)
- there are systems in place for keeping children safe from extremist material when accessing the internet in our setting by using effective filtering and usage policies

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- All team members have received PREVENT training and a DSL will act as the point of contact within our organisation for any concerns relating to radicalisation and extremism.
- Commissioning DSLs (i.e those from the child or young persons school, alternative education team or commissioning provider), and/or an AlphaC DSL may make referrals in accordance with [Norfolk Channel Procedures](#) and an AlphaC DSL may represent our organisation at Channel meetings as required.

Peer on peer sexual violence and sexual harassment

7.15 At AlphaC all team members are trained so that they are aware that safeguarding issues can manifest themselves via peer-on- peer abuse. This is most likely to include, but may not be limited to:

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

7.16 We recognise that children, young people and adults at risk 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 team members and volunteers remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between children; and that consensual and non-consensual sharing of nudes and semi-nudes images and or videos³ (also known as sexting or youth produced sexual imagery) is also a form of peer-on-peer abuse.

7.17 We understand, that even if there are no reports in our organisation it does not mean it is not happening, it may be the case that it is just not being reported. We recognise that people may not find it easy to tell team members about their abuse and can show signs or act in ways that they hope others 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 and the same safeguarding procedures will apply in respect of any person who is suffering or likely to suffer significant harm. AlphaC team members and volunteers must never tolerate or dismiss concerns relating to peer-on-peer 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, and, in worst case scenarios, a culture that normalises abuse leading to persons accepting it as normal and not coming forward to report it.

7.18 At AlphaC 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.

7.19 At AlphaC team members 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.

³ UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

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7.20 All team members will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about peer-on-peer abuse. A DSL will notify the home school or other commissioner of any safeguarding concerns in this area **without delay** (see p4).

7.21 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 with the home school Designated Safeguarding Lead or other commissioner, we will signpost and seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren). Where appropriate, we will share risk assessments and/or advice from the HSB team with the commissioner.

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

Modern Slavery

7.23 At AlphaIC 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, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature.

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

Safeguarding responses to children who go missing

7.24 At AlphaIC all team members 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. As stipulated in [Keeping Children Safe in Education 2024](#), attendance and safeguarding are inextricably linked. Very poor attendance in school may be a child protection issue in it's own right under 'educational neglect'.

Attendance for each child or young person attending each Alpha Inclusion session is recorded by practitioners and additionally monitored by our administration team. Practitioners must log any absence with those who have commissioned the work. For children and young people whom have been referred into us by the AES Service Officer their attendance is always logged with the central mailbox cs.educationalprovision@norfolk.gov.uk as soon as possible and by 4.30pm on the day of the session.

Repeated absence must also be monitored and recorded with Alpha DSL's and Quality and Impact Guardian also being informed. AlphaIC team members will alert the Safeguarding Guardian or alternate DSL and Quality and Impact Guardian if a young person has missed two consecutive sessions or whereby there are concerns around attendance.

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The AlphaIC DSL team meet regularly (fortnightly) to ensure attendance and safeguarding data are monitored and that we intervene early in cases of poor attendance and/or unexplained absences.

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

- an attendance register is taken during each session and monitored by our admin teams
- attendance (positive attendance, lateness and absences) is reported to the home school/commissioner as part of the child or young person's session
- we hold at least two emergency contact numbers for each of the children who attend our setting wherever possible
- if a child absconds from an AlphaIC session, the home school/commissioner and parent/carer will be informed immediately.
- team members will alert the safeguarding lead to any concerns raised regarding children who are absent
- any absence concerns will be discussed with the commissioner without delay
- attendance for children and young people referred into our service by the AES team is sent directly to cs.educationalprovision@norfolk.gov.uk in line with the AES policy and procedures.

Mental Health

7.25 At AlphaIC all team members are made aware, through training, that mental health problems can, in some cases, be an indicator that a child, young person or adult has suffered or is at risk of suffering abuse, neglect or exploitation. Our team members are well placed to observe 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.

7.26 We understand that where children young people and adults have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, team members are aware of how children's experiences, can impact on their mental health, behaviour and education. All team members are aware that if they have a mental health concern about a child young person or adult that is *also* a safeguarding concern, they should take immediate action by passing the information on to the safeguarding lead. The home school or other commissioner will be informed of any safeguarding concerns in this area **without delay** (see p4).

Online Safety

7.27 At AlphaIC all team members are aware that technology is a significant component in many safeguarding and wellbeing issues. Modern digital technology has made access to information and communication increasingly easy for everyone. This is especially so for those who cannot always go out to socialise and rely on websites for social networking, watching films, downloading music, buying lottery tickets, shopping etc. Government guidance is clear, that all organisations working with children, young people adults at risk, families, parents and carers have responsibilities. It is also important to remember, children, young people and adults at risk can also abuse and such incidents fall into the remit of this policy. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

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7.28 Everyone in our organisation is required to agree and sign our **Mobile Devices and Acceptable Uses of IT Policy** and undergo regular updated safeguarding training. We ensure online safety is a running and interrelated theme throughout all ongoing training and safeguarding developments and is reflected in relevant policies, training, the role and responsibilities of the Designated Safeguarding Leads and parental engagement and support offered where appropriate.

In our organisation there are many potential risks including:

- accessing inappropriate or illegal websites.
- receiving unwanted or upsetting texts, e-mail messages or images.
- being “groomed” by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime.
- sharing nudes or semi nudes.
- viewing or sending unacceptable material such as inciting hatred or violence.
- sending bullying messages or posting malicious details about others.
- ignoring copyright law by downloading e.g. music, videos, homework cheat materials etc.
- overspending on shopping and gambling sites.
- being at risk of identity fraud for money transactions.
- inappropriate relationships or prostitution.

What else might be of concern?

<p>A child, young person, adult or adult at risk who:</p> <ul style="list-style-type: none"> • is becoming secretive about where they are going to or who they are meeting. • will not let you see what they are accessing online. • is using a webcam in a closed area, away from other people. • is accessing the web or using a mobile for long periods and at all hours • clears the computer history every time they use it. • receives unexpected money or gifts from people you don't know. • does not appear to have the money they should have. 	<p>A person who:</p> <ul style="list-style-type: none"> • befriends a child, young person or adult at risk on the internet or by text messaging. • has links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker. • is secretive about what they are doing and who they are meeting.
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How will we minimise risks?

We will:

- talk to children, young people and adults at risk about what they are accessing online.
- ensure everyone uses PCs, iPads and other technology in a general space where we can monitor what is going on.
- explain the risks of giving out personal details online.
- talk about how people can be anyone they want to be online, e.g. by using misleading emails, photographs of other people, telling lies about their age, hobbies, school.
- encourage children, young people and adults to think carefully about what photographs or videos they use online. They can be used and tampered with by other people, or they may not be appropriate.
- advise children, young people and adults to only text, chat or webcam to people they know in real life.
- talk about how to identify SPAM messages or junk mail and how to delete them. This also applies to messages from people they do not know, or opening attachments.
- discuss how people hide their identities online and the importance of never meeting new online “friends” in real life.
- make sure children, young people and adults understand they can always talk to team members, trusted adults, or parents and/or carers, about anything that makes them feel uncomfortable.
- look on the internet together for information about how to deal with or report problems. e.g. [The National Crime Agency's CEOP Education](#)

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- talk about how/when information or images get on to the internet, they can never be erased.

Other useful resources can be found at [Ofcom](#)

7.29 At AlphaIC we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children face in our setting (even if the use of technology does not feature in their programme). For example, as a setting, we commit to ensuring that:

- colleagues using the internet to carry out work tasks must do so with regard to our online safety policy
- colleagues will not use personal mobile and/or smart watch devices in front of children, nor use them to record any images or videos of children accessing our setting
- colleagues will respect the rules regarding social media, as outlined in our online safety policy
- parent carer consent will be sought regarding photo consent
- if photographs are taken of children for the purposes of recording progress, these will be stored securely

The home school or other commissioner will be informed of any safeguarding concerns in this area **without delay** (see p4).

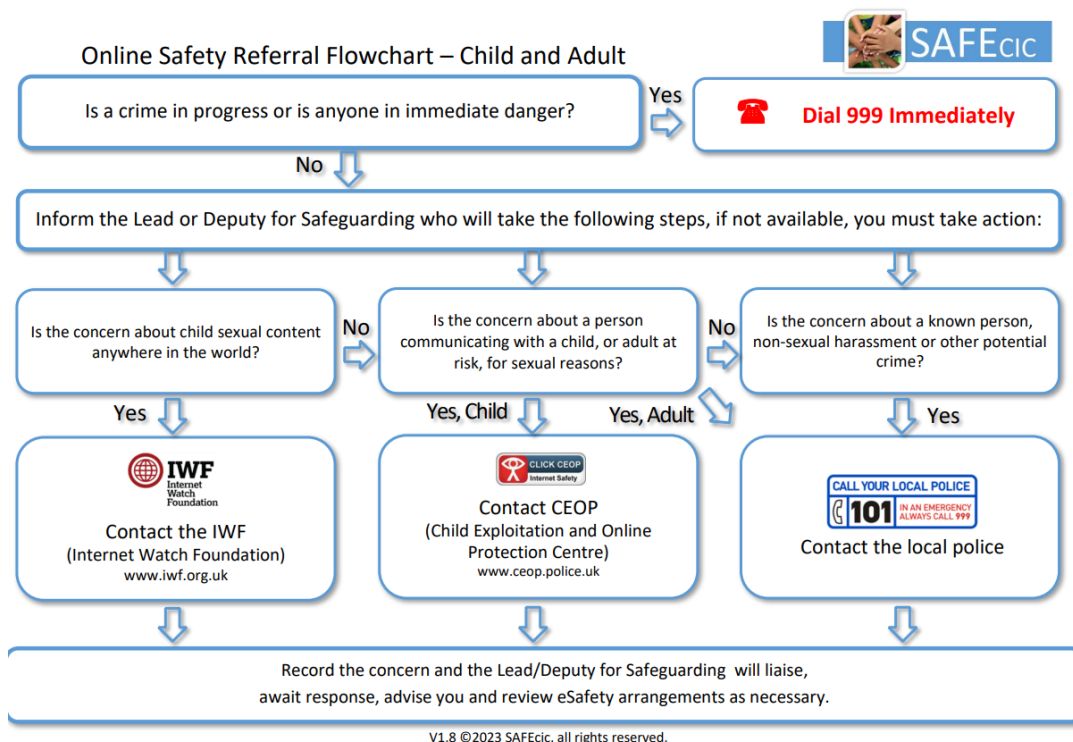
Team members regularly contribute to an 'approved websites' list and we adhere to DfE filtering and monitoring standards through our external service provider (Delta Soft www.deltasoft.co.uk).

Cybercrime

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

If there are concerns about a child, young person or adult in this area, as part of a safeguarding log being received the Safeguarding team, a DSL or Alternate DSL may suggest a referral to the [Cyber Choices programme](#) which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

If there are concerns about a person in this area, the the home school or other commissioner must be notified **without delay** (see p4) and use [SAFE CIC Online Safety referral guidance](#) to further support our actions and recording ([Online Safety Referral flowchart, SAFE CIC 2023](#)).



Domestic Abuse

7.31 At AlphaIC all team members are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. We understand that children can be victims of domestic abuse, and this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. We are aware of the [Norfolk Integrated Domestic Abuse Service \(NIDAS\)](#) and signpost victims to the service. [Norfolk and Suffolk Victim Care](#) are available to offer support where threshold for NIDAS support has not been met.

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

Children with special educational needs and disabilities or physical health issues

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

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

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

7.34 At AlphaIC 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, young people and adults who are lesbian, gay, bisexual or transgender, intersex, queer/questioning or asexual (LGBTQIA+)

7.35 The fact that a child, young person or adult may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education', we recognise that persons who are LGBTQIA+ or those perceived by others to be LGBTQIA+ could potentially be more vulnerable and therefore we work to reduce any additional barriers faced. We provide a safe space for these children, young people and adults to speak out or share their concerns with team members. Team members are additionally provided with training to support awareness of homophobic, biphobic and transphobic bullying and abuse.

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

8. Recording and information sharing

8.1 If team members are concerned about the welfare or safety of any person at AlphaIC, they will record their concern either on the agreed reporting form ([Appendix 1](#)) or through the setting's electronic system. Any concerns should be passed to the safeguarding lead without delay.

When a disclosure is made by a child, young person or adult at risk it is important to remember:

- **Do** stay calm and listen carefully.
- **Do** reassure them that they have done the right thing in telling you.
- **Do** consider who else can hear
- **Do** take what you are being told seriously
- **Do not** investigate or ask leading questions.
- **Do** let them know that you will need to tell someone else.
- **Do not** promise to keep what they have told you a secret.
- **Do** inform a Designated Safeguarding Lead or a Deputy as soon as possible (See section 5.10-5.17 for different contexts).
- **Do** make a written record of the allegation, disclosure or incident which you must sign, date and record your position.
- **Do not** include your opinion without stating it is your opinion.
- **Do** refer without delay.

A disclosure may come from someone telling you:

- they have or are being abused
- they have concerns about someone else
- they are themselves abusing or likely to abuse someone else

If you are concerned that a member of staff or adult in a position of trust poses a danger to a child or young person or that they might be abusing a child or young person you should report your concerns to the Designated Safeguard Lead. Where those concerns relate to the DSL however, it is important to refer to the Deputy or Alternate Safeguarding person. This may not be appropriate, in which case any member may personally refer direct to Children's Social Care Services or Board member as previously detailed in this document.

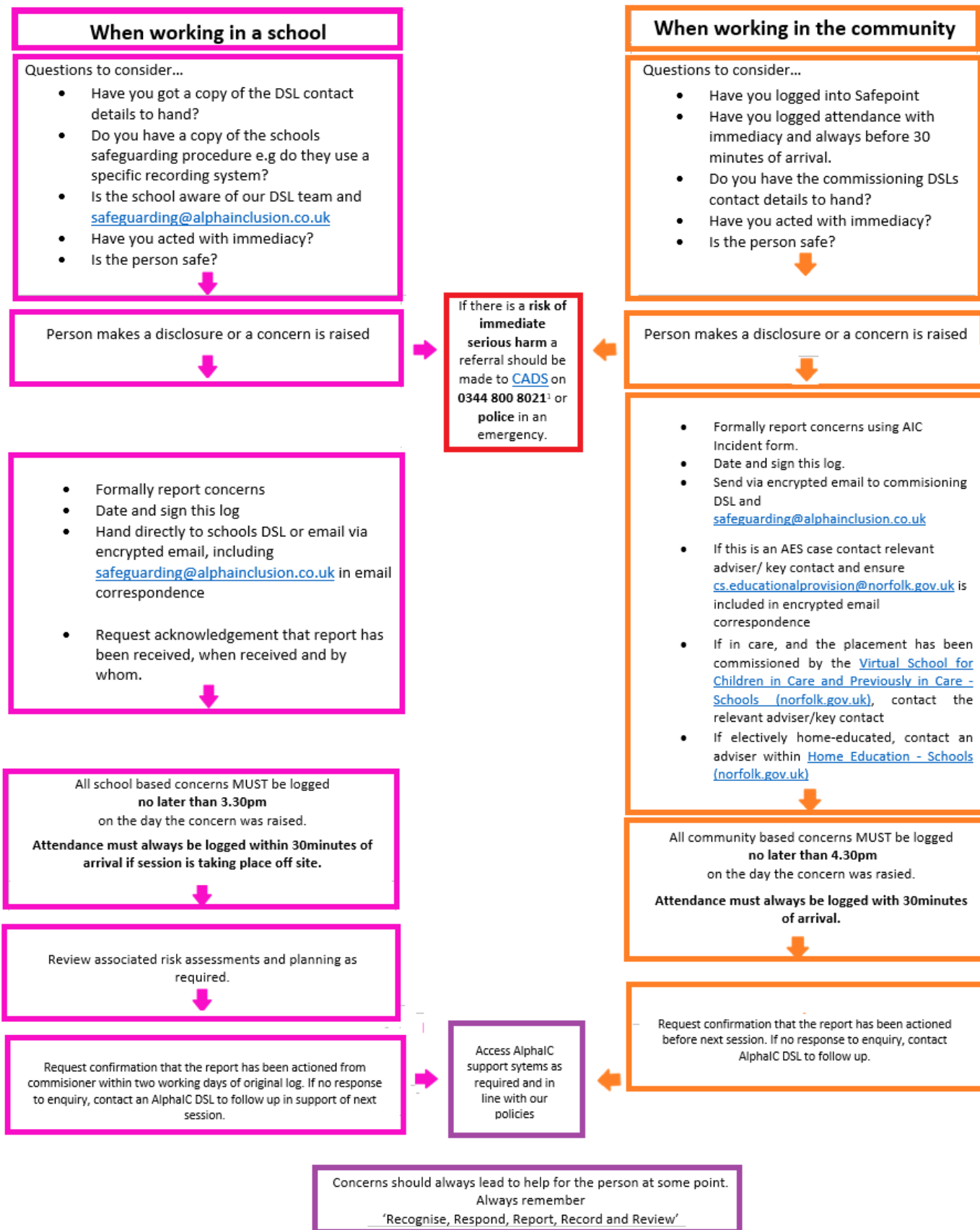


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We ensure, and emphasise, that everyone in AlphaIC understands and knows how to share any concerns immediately with our AIC DSL Leads or Alternate DSLs. Everyone, including members of the DSL team, will deal with concerns using the following process;

Flowchart taken from BCC230524 Safeguarding Information for Staff and Regular visitors



8.2 Any information recorded will be kept in a named file, in an encrypted electronic system and never, kept with the child, young person's progress file. These files will be the responsibility of the safeguarding lead. Safeguarding information will only be shared within the setting on the basis of 'need to know in the child or young person's interests' and on the understanding that it remains strictly 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
- At AlphaIC we will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This includes instances where referrals were or were not made to another agency such as the Children's Advice and Duty Service or the Prevent programme.

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

8.5 AlphaIC will follow its **AlphaIC's GDPR and Data Protection Policy 2024** and confidentially destroy the file after seven years.

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 recorded delivery.

9. Working with commissioners

9.1 AlphaIC communicates primarily with the home school or commissioner where there are safeguarding concerns.

9.2 AlphaIC is committed to working in partnership with home schools, commissioners and parent and/or 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 service, home schools, commissioners and parent and/or 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 at <https://alphaic.co.uk/> Parent and/or carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to contact the **Children's Advice and Duty Service (CADS)**.

9.4 We are committed to working with parent and/or carers positively, openly and honestly. We ensure that all parent carers are treated with respect, dignity and courtesy. We respect parent 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 or young person from harm.

9.5 To keep children and young people safe and provide appropriate care for them, AlphaIC requires commissioners and parent and/or carers to submit accurate and up to date information regarding:

- full names and contact details of all adults with whom the child normally lives

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- 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 *AlphaIC* will retain this information on the child's file. The setting will only share information 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.

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/commissioner would normally be the education representative at such meetings. However, our team members may be asked to attend a child protection conference or core group meetings in respect of individual children. Usually, the person representing *AlphaIC* at these meetings will be a safeguarding lead. The person attending will need to have as much relevant up to date information about the child as possible; any member of team members 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 | PWWC \(norfolkscp.org.uk\)](#). 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 Continuum of Needs | NSCP | PWWC \(norfolkscp.org.uk\)](#) under the 'Genogram & Chronologies Resources and Guidance' tab. The information contained in the report will be shared with parents/carers before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at *AlphaIC*. In order to complete such reports, all relevant information will be sought from team members working with the child.

11. Safer recruitment

11.1 We will ensure that the Founder/Director and at least one other senior team member (e.g a People Guardian) have completed appropriate safer recruitment training. At all times the Founder/Director will ensure that safer recruitment practices are followed, broadly in line with those detailed in Part 3 of [Keeping children safe in education](#). At least one person involved in conducting an interview will have received safer recruitment training.

11.2 At *AlphaIC* 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.

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 AlphaIC 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 team members, volunteers and trustees to ensure we are recruiting and selecting the most suitable people to work with children.

11.5 We will maintain a Single Central Record [SCR]⁴ of all safer recruitment checks carried out in line with recommendations from [Keeping children safe in education](#). A senior member of team members will check the SCR regularly to ensure that it meets statutory requirements.

11.6 At AlphaIC we recognise that safer recruitment is not just about carrying out the right DBS checks and is not limited to recruitment procedures. Therefore, we understand the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

11.7 As per paragraph 334 of [Keeping children safe in education](#) we will ensure that written confirmation is provided to all home schools and commissioners that appropriate safeguarding checks have been carried out on our team members, 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 team members files.

12. Safer Working Practice

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

12.2 All team members 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 team members or volunteers are working with children alone they will, wherever possible, be visible to other members of team members. They will be expected to inform another member of team members of their whereabouts, who they are with and for how long. Doors should have a clear visual panel in them and be left open.

12.4 Guidance about acceptable conduct and safe practice will be given to all team members 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 [Safer Recruitment Consortium training information](#) (February 2022). All team members and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

12.5 Please refer to our organisation's lone-working policy and/or safeguarding procedure for carrying out home visits and/or sessions in community spaces as applicable. *(delete as relevant)*

13. Managing allegations against staff and volunteers

13.1 Allegations that may meet the harms threshold

⁴ See [Safeguarding forms and templates - Schools \(norfolk.gov.uk\)](#) for a template

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Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children. We do 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 there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in [Working together to safeguard children \(2023\)](#) and [Keeping Children Safe in Education](#). An allegation may relate to a person who works/volunteers with children who has:

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

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

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

13.5 We will take all possible steps to safeguard our 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](#) and Part 4 of [Keeping Children Safe in Education](#) are adhered to and will seek appropriate advice. The first point of contact for settings regarding concerns and/or allegation issues is via the **Local Authority Education Duty Desk on 01603 307797**. A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service then the [LADO referral form](#) should be completed. The completed LADO referral form is then sent via email to: LADO@norfolk.gov.uk.

13.6 If an allegation is made or information is received about *any* adult who works/volunteers in our setting which indicates that they may be unsuitable to work/volunteer with children, the member of team members receiving the information should inform the Founder/Director immediately. In the event that the concern is about the Designated Safeguarding Lead or Alternate DSL/ Deputy, any team member should refer direct to the Founder/ Director. For any concerns relating to AlphaIC Founder and Director team members allegations should also be passed onto our Non-Executive Director, Rick Ogle-Welbourn (rickoglewel@gmail.com).

13.7 Advice from the LADO should be sought within one working day. No member of team members will undertake further investigations before receiving advice from the LADO.

13.8 Any member of team members who does not feel confident to raise their concerns with the Founder and Director or Non-Executive Director, should contact the LADO directly via email to 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. Further national guidance can be found at: [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is also available for team members who do not feel able to raise concerns regarding child protection failures

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internally. Team members 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.

13.10 AlphaIC 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 team members 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 team members at our organisation, 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 we need guidance on making a Barring Referral, we will contact the [East of England DBS Outreach Advisor](#) for support.

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 or young person does not meet the thresholds as stated above. In Norfolk the 'low level' concern process is to consult with the **Local Authority Education Duty Desk on 01603 307797**. At AlphaIC we recognise a low-level concern to be something which is

- inconsistent with the team members 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.

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

13.13 At AlphaIC team members report all low level concerns to the Designated Safeguarding Lead or Alternate Safeguarding Lead. If reported to a Safeguarding lead, they will inform the Founder/Director, 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 team members understand the importance of self-referring, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

13.15 At AlphaIC we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and take action 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 team members member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.

13.16 We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

14. Relevant policies and guidance

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

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- **Safeguarding Concerns Reporting Form:** BCC240524 – Safeguarding Concerns Reporting Form
- **Safeguarding Information for Team Members and Regular Visitors:** BCC230424 Safeguarding Information for Staff and Regular Visitors
- **Incident recording log:** <https://forms.office.com/e/e0GaQWpNLU>
- **Approved websites:** [ASM110923 - Approved websites.xlsx \(sharepoint.com\)](#)
- **Media log:** [ASM070923 - Media log.xlsx](#)
- **Online Safety Policy 2024:** BSM040124 – E-Safety Policy 2024
- **Mobile Device and Acceptable Use of IT policy 2023:** ASM150224 Mobile device and Acceptable Use of IT Policy
- **Online Safety Referral flowchart, SAFE CIC 2023**
- **Staff Code of Conduct 2024**
- **Gifts and Hospitality Policy:** BSM200524 – Gifts and Hospitality Policy
- **Health and Safety Policy Statement:** CSM310124 AIC Health and Safety Policy Statement
- **Safer Recruitment which adheres to Part 3 of *Keeping Children Safe in Education*.**
- **First Aid procedure**
- **Whistleblowing**
- **GDPR and Data Protection Policy 2024**

14.2 This policy makes reference to the following publications

8.3 Allegations Against Persons who Work/Volunteer with Children - Norfolk Safeguarding Children Partnership (norfolkscsb.org)

Alternative provision - GOV.UK (www.gov.uk)

Children and Families Act 2014 <https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

Criminal exploitation of children and vulnerable adults: County Lines

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Independent school registration - GOV.UK (www.gov.uk)

Guidance for safer working practice for those working with children and young people in education settings Feb. 2022

https://www.saferrecruitmentconsortium.org/files/ugd/f576a8_0d079cbe69ea458e9e99fe462e447084.pdf

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

Preventing youth violence and gang involvement

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

Regulated activity in relation to children: Scope

[https://assets.publishing.service.gov.uk/media/5a80bdfbed915d74e33fc265/Regulated activity in relation to children.pdf](https://assets.publishing.service.gov.uk/media/5a80bdfbed915d74e33fc265/Regulated_activity_in_relation_to_children.pdf)

Sharing nudes and semi-nudes advice

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

When to call the police: a guide for school and colleges, National Police Chiefs Council, child-centred policing

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>

Working together to improve school attendance - GOV.UK (www.gov.uk)

Working together to safeguard children - GOV.UK (www.gov.uk)

Appendix 1

Form Ref: BCC240524

Recording Form for Safeguarding Concerns

For safeguarding concerns about a child or young person **all Team Members and regular visitors are required to complete this form and pass it to the commissioning DSL and Alpha Inclusions DSLs**, namely Ricci Butler (07483414811), Deanna Mason (07483414728) or Claire Chadderton (07483414744) and via the secure mailbox safeguarding@alphainclusion.co.uk to pass onto commissioning DSLs. Our main base phone number is (01603) 926170. For AES cases the email cs.educationalprovision@norfolk.gov.uk should also be included in correspondence.

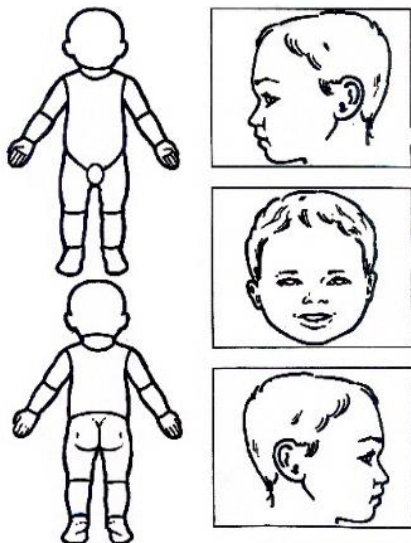
Please complete this sheet and pass to a DSL. This form will be logged on our secure electronic system. Safeguarding concerns must be submitted by 3.30pm (schools) and 4.30pm (community based) at the absolute latest on the day the concern is raised.

Full name of child and Alpha ID	Date of Birth (if known)	Date and time of incident	Location	Name of person completing the form

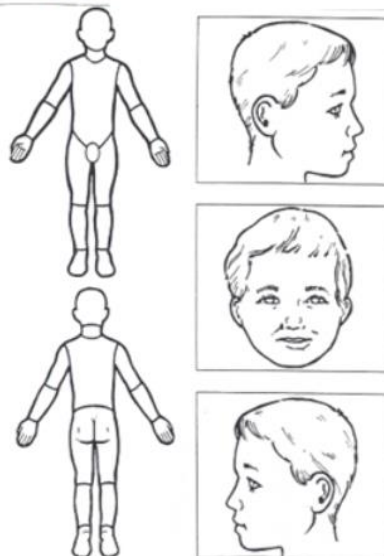
Nature of concern/disclosure (highlight all that you think apply)							
Neglect	Emotional	Physical	Sexual	Online safety	PREVENT	Attendance	Other (please specify)
Was there an injury or mark? (If yes, please fill in the next column)				Did you see the physical mark? and/ or Did you witness the incident?			
Describe the injury or incident:							
Have you filled in a body plan (attached) to show where the injury is and <u>it's</u> approximate size? N/A							
Was anyone else with you? (If yes, please fill in the next column)				Who? (Name and role if known)			
Has this happened before and if so, when?							
Do other agencies need to be informed? If so, have you done this? Please specify e.g School DSLs, Section 19 team, CCS, Attendance officer, PREVENT, additional agencies etc							
Have parents been informed? If no, please state the reason							
Who are you passing this information to? (highlight below) Name: Ricci Butler Deanna Mason Claire Chadderton Position: Designated Safeguarding Lead at AIC Your signature: Time: Date:							

Body Map

Young Child



Older Child



Which side of body (please specify)?

Left or Right

This section to be completed by AIC DSL:

Action taken by Safeguarding Lead:						Date actioned and by who:			
Who has this incident been referred to (name and date)									
School DSL	NCC Commissioner DSL	Children's Services	Police	PREVENT	School Nurse	Attendance Improvement Officer	PSA	Guidance Adviser	Other (please specify)
Added to encrypted DSL log? Date and initial					Uploaded to YP encrypted file and chronology- date and initial				
Feedback sent to...? Name if known									
Full name of safeguarding lead:									
Signature:						Date:			

Appendix 2 Induction Checklist for new starters

Safeguarding Induction Sheet for new team members and regular visitors or volunteers.

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

If you have any concerns about a child, young person or adult 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 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 *AlphaIC* are:

Designated Safeguarding Lead: Claire Chadderton (Safeguarding Guardian)

Email safeguarding@alphainclusion.co.uk

Contact Number: 07483414744

Alternate Safeguarding Lead: Ricci Butler (Practitioner Team Lead, People Guardian)

Email safeguarding@alphainclusion.co.uk

Contact Number: 07483414811

Alternate Safeguarding Lead: Deanna Mason (Practitioner Team Lead, People Guardian)

Email safeguarding@alphainclusion.co.uk

Contact Number: (01603) 926170

Local safeguarding procedures

Children's Advice and Duty Service [CADS]

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

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

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

a. Yes

- i. Do you have the consent of the parent/carer/young person to make contact with CADS or have you informed them of your intention to do so?

1. Yes

- a. Gather all the family's details including dates of birth, current address, current and working contact details and family composition, along with the history and current worries. Ensure that you have to hand details of any support already provided to the child or family.

2. No

- a. Inform the parent/carer and/or gain their consent for you to make this contact unless doing so would put the child at risk

b. No

- i. Have you discussed the child's needs with your safeguarding lead or your line manager?
ii. Discuss the child with your safeguarding lead or line manager if available and follow their advice when providing support to the family

2. Call CADS on the professionals only phone line 0344 800 8021.

3. Make a record of the discussion.

4. Follow the advice given by the consultant social worker.

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

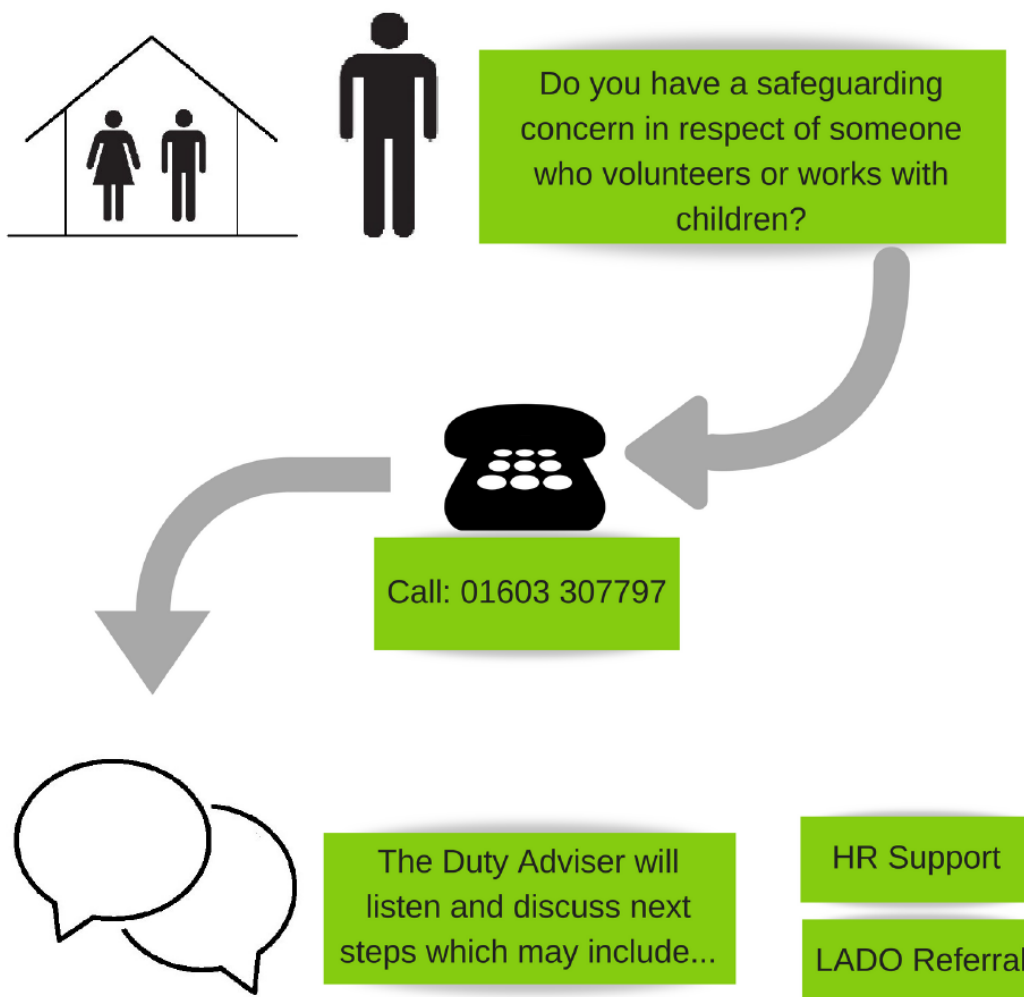
6. The contact number for parents, carers and members of the public is 0344 800 8020.



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)

333. *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 needs of the pupil.*

334. *Schools should obtain **written confirmation** from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own 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 team members 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)	

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Appendix 6 Useful contacts

Useful contacts

Norfolk CADS (Children's Advice and Duty Service): 0344 800 8021

Norfolk Safeguarding Partnership and members section: <https://www.norfolkscb.org/> 01603 223409

Norfolk Safeguarding Adults Board: <https://www.norfolksafeguardingadultsboard.info/> 03448008020

Customer First: 0845 023023

Police: 999

NSPCC: 0800 800 5000

Safe CIC: <http://www.safecic.co.uk/esafety-site>

BECTA www.becta.org.uk

Child Exploitation and Online Protection Agency www.ceop.org.uk

Think you know www.thinkuknow.co.uk

Just One Norfolk <https://www.justonenorfolk.nhs.uk/> 03003000123

For your information Norfolk (FYIN) <https://www.fyinatorfolk.nhs.uk/>

[Safeguarding Section](#) of the [Norfolk Schools and Learning Providers website](#).

PREVENT www.norfolk.police.uk/advice/advice-and-information/t/prevent/prevent/

HSB hsbproject@norfolk.gov.uk

Forced Marriage Unit Statutory guidance

<https://www.gov.uk/guidance/forced-marriage> has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTIAGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf

Contact 020 7008 0151 or email fmufco.gov.uk

Appendix 7

Additional information for AIC team members related to possible signs and indicators of abuse

Abuse related to faith or belief

Child abuse linked to faith or belief can include a belief in concepts of:

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs);
- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context);
- ritual or multi murders where the killing of children is believed to bring supernatural benefits, or the use of their body parts is believed to produce potent magical remedies;
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

[\(Child Abuse Linked to Faith or Belief | Safeguarding Network\)](#)

Alcohol and Substance misuse

Alcohol and substance misuse can lead to a wide range of physical, psychological and social problems. Substance misuse disorder is the consumption of substances that leads to the involvement of social, psychological, physical, or legal problems.

[\(Drug and alcohol misuse - Preventing Exploitation Toolkit\)](#)

Breast Ironing

Breast ironing is a form of child abuse that damages young girls' breasts to flatten them and delay their development.

[\(Breast ironing \(flattening\) | Metropolitan Police\)](#)

Carrying offensive weapons

Section 1(4) defines an offensive weapon as "any article made or adapted for use for causing injury to the person or intended by the person having it with him for such use by him or by some other person".

[\(Offensive Weapons, Knives, Bladed and Pointed Articles | The Crown Prosecution Service \(cps.gov.uk\)\)](#)

Child criminal and sexual exploitation including County Lines

These are serious forms of abuse that involve manipulating, coercing, or deceiving children into criminal activities or sexual acts. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Child Criminal Exploitation (CCE)

CCE occurs when children are exploited to commit crimes. This can include activities such as drug trafficking, theft, or other illegal acts. A common form of CCE is **County Lines** exploitation, where gangs and organized criminal networks use children to transport and sell drugs across different regions. [The term "County Lines" refers to the mobile phone lines used to control and communicate with the children involved.](#)

Child Sexual Exploitation (CSE)

CSE involves children being manipulated or forced into sexual activities. This can happen through grooming, where the perpetrator builds a relationship with the child to gain their trust before exploiting them sexually. [CSE can occur both online and offline and often involves threats, violence, or blackmail.](#)

County Lines

County Lines is a specific type of CCE where urban gangs exploit children and vulnerable adults to move and store drugs and money. These gangs often use coercion, intimidation, and violence to control their victims. [The children involved are often transported to different areas, sometimes far from their homes, to carry out these activities.](#)

Child on child abuse, including sexual violence and upskirting

[Child-on-child abuse, also known as peer-on-peer abuse, occurs when children under the age of 18 sexually, physically, or emotionally abuse another young person¹.](#) This can include inappropriate behaviours such as physical, sexual, or emotional abuse, exploitation, sexual harassment, bullying, coercive control, and hazing/initiation rituals between children and young people.

Child on child sexual violence and sexual harassment

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;

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- upskirting;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

Concealed pregnancy

A concealed pregnancy is when a woman or girl knows she is pregnant but does not tell any health professional; or when she tells another professional but conceals the fact that she is not accessing antenatal care; or when a pregnant woman tells another person and they conceal the fact from all health agencies.

[NYSCP \(safeguardingchildren.co.uk\)](https://www.nyscp.org.uk)

Discrimination

The unjust or prejudicial treatment of different categories of people, especially on the grounds of ethnicity, age, sex, or disability.

Disguised compliance

Disguised compliance involves care-givers presenting an appearance of being co-operative and supportive in order to avoid scrutiny, suspicion or concern. Disguised compliance was a term first used in 1993 to describe some families' behaviour when receiving interventions from social care – however it can apply in any discipline when practitioners are trying to encourage and initiate change in parenting behaviour. This is often a reaction to a practitioner choosing to take a more authoritative or assertive stance. Disguised compliance occurs when a family attempt to maintain the appearance of complying with plans to safeguarding or promote the welfare of the child, but do not follow this through with meaningful action. Sometimes this may include a short period of improvement which is not sustained.

[Disguised-Compliance-factsheet.pdf \(greenwichsafeguardingchildren.org.uk\)](https://www.greenwichsafeguardingchildren.org.uk)

Domestic abuse/ violence

Domestic violence is [violence](#) or other [abuse](#) that occurs in a domestic setting, such as in a [marriage](#) or [cohabitation](#). *Domestic violence* is often used as a synonym for [intimate partner violence](#), which is committed by one of the people in an [intimate relationship](#) against the other person, and can take place in relationships or between former spouses or partners. In its broadest sense, domestic violence also involves violence against children, parents, or the elderly. It can assume multiple forms, including [physical](#), [verbal](#), [emotional](#), [economic](#), [religious](#), [reproductive](#), financial abuse, or [sexual abuse](#), or combinations of these.

[Domestic violence - Wikipedia](#)

Emotional Abuse

Emotional Abuse is where a young person's need for love, security, recognition, and praise is not met. It may involve seeing or hearing the ill-treatment of someone else such as in Domestic Violence or Domestic Abuse. A parent, carer, or authority figure is considered emotionally abusive when they are consistently hostile, rejecting, threatening, or undermining, toward a child, young person or other family member. It can also occur when children are prevented from having social contact with others or if inappropriate expectations are placed upon them. Symptoms that indicate emotional abuse include:

- excessively clingy or attention seeking.
- very low self-esteem or excessive self-criticism.
- withdrawn behaviour or fearfulness.
- lack of appropriate boundaries with strangers; too eager to please.
- eating disorders or self-harm.

Exploitive use of technology

The exploitive use of technology can manifest in various. Overuse of technology, particularly social media, can lead to mental health issues such as depression, anxiety, and social isolation. [The design of these platforms often prioritizes engagement over well-being, and can lead to addictive behaviours.](#) Technology can also be used to exploit others in various ways for example the collection and use of personal data and creative content can lead to privacy violations and misuse of information.

Female genital mutilation (FGM)

FGM is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It's also known as female circumcision or cutting, and by other terms, such as Sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It's illegal in the UK and is child abuse.

It's very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health.

[Female genital mutilation \(FGM\) - NHS \(www.nhs.uk\)](https://www.nhs.uk)

Financial or material abuse

Financial or material abuse involves the control of money or resources, and is done to limit a person's freedom. Examples: fraud, theft, taking property without permission, assuming ownership of money or items, scamming (which can be in person, by letter, phone and internet), coercion

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in relation to an adult's financial affairs including the writing of or changing a Will, and misuse of benefits. Financial abuse can involve small and large amounts of money or value of property.

[Financial or Material Abuse - Safeguarding Adults Executive Board \(saeb.org.uk\)](#)

Forced marriage

Forced marriage is a marriage in which one or more of the parties is married without their consent or against their will. A marriage can also become a forced marriage even if both parties enter with full consent if one or both are later forced to stay in the marriage against their will. A forced marriage differs from an arranged marriage, in which both parties presumably consent to the assistance of their parents or a third party such as a matchmaker in finding and choosing a spouse. There is often a continuum of coercion used to compel a marriage, ranging from outright physical violence to subtle psychological pressure.

[Forced marriage - Wikipedia](#)

Gangs

A gang is a non-transient and usually street-based collection of people who view themselves as a group, and who view violence and crime as a key part of group identity. They usually claim ownership over a territory and have identifiable markers of membership, such as dress codes or tattoos.

Gangs use violence to gain recognition, status and power over their rivals, including other gangs. People involved in gangs are vulnerable to violence, abuse and exploitation by members of their own or rival gangs.

Gangs can be confused with peer groups who gather in public places to socialise and may engage in antisocial behaviour. Unlike these groups, gangs are characterised by high levels of violence and criminality.

Gang membership is based on conformity to the group and participation in group activities. This can create strong feelings of loyalty and belonging among members and can act as a way of grooming and exploiting people into taking part in gang activities – including violence, drug dealing and other criminal activities.

[Gangs - Preventing Exploitation Toolkit](#)

Gambling

Gambling disorder (gambling addiction) is a mental health condition characterized by recurrent, maladaptive gambling behaviour that can cause clinical stress. It causes major problems with your relationships, work or school, and/or finances.

[Gambling Disorder \(Gambling Addiction\): What It Is & Symptoms \(clevelandclinic.org\)](#)

Hate and mate based crime

Hate crime is a range of crimes motivated by, or perceived by the victim to be motivated by, hostility or prejudice. Mate crime is where a perpetrator befriends a vulnerable person, particularly people with learning disabilities, with the intention of then exploiting them.

<https://safeguarding.je/wp-content/uploads/2022/12/Discriminatory-Abuse.pdf>

Hazing and initiation rites

Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups, including gangs, sports teams and school groups.

[Notton House Academy - Initiation, Hazing, and Ritualistic Violence](#)

Hoarding

Hoarding is the practice of collecting or accumulating something (such as money or food). Hoarding, also called hoarding disorder and compulsive hoarding is a mental health condition characterized by persistent difficulty discarding or parting with possessions, regardless of their actual value. This behaviour results in the accumulation of items that clutter living spaces, significantly impairing daily functioning and causing distress.

[Hoarding Disorder: Complications and Insights | Psychology Today United Kingdom](#)

Honour-based violence

Honour-based abuse is a crime or incident committed to protect or defend the 'honour' of a family or community.

If your family or community think you've shamed or embarrassed them by behaving in a certain way, they may punish you for breaking their 'honour' code. [What is honour-based abuse? | Metropolitan Police](#)

Modern slavery

Modern slavery is when someone loses their freedom and is controlled and exploited by another person or period for personal or commercial gain. Modern slavery takes many forms. The most common are:

- Human trafficking: The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal
- Forced labour: Any work or services people are forced to do against their will, usually under threat of punishment
- Debt bondage/bonded labour: The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt

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- **Descent-based slavery** (where people are born into slavery): A very old form of slavery, where people are treated as property, and their “slave” status has been passed down the maternal line.
- **Child slavery**: When a child is exploited for someone else’s gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery
- **Forced and early marriage**: When someone is married against their will and cannot leave. Most child marriages can be considered slavery
- **Domestic servitude**: Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person’s home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

[What is modern slavery? | Anti-Slavery International \(antislavery.org\)](#)

Neglect and acts of omission

A person who has responsibility for the charge, care or custody of an adult with care and support needs who fails to provide the amount and type of care required to meet those needs. Neglect can be intentional or unintentional.

Some examples are listed below:

- Ignoring medical, emotional or physical care needs
- Failure to provide access to appropriate health, care and support or educational service
- The withholding of the necessities of life, such as medication, adequate nutrition and heating
- Failure to administer medication as prescribed
- Failure to allow choice and preventing people from making their own decisions
- Ignoring or isolating the person
- Not taking account of individuals’ cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs

[Neglect and Acts of Omission | Teeswide Safeguarding Adults Board \(tsab.org.uk\)](#)

Online safety

Online Safety protects the people using digital devices from harm by the devices and networks (and therefore third parties) through awareness, education, information and technology.

It is what we call the appropriate approach to personal safety when using digital technologies.

Online Safety is being aware of the nature of the possible threats that you could encounter whilst engaging in activity through the Internet. These could be security threats, protecting and managing your personal data, online reputation management, and avoiding harmful or illegal content.

[What is Online Safety? | SWGfL](#)

Organisational or institutional abuse

Organisational or Institutional abuse is the mistreatment of people brought about by poor or inadequate care or support, or systematic poor practice that affects the whole care setting. It occurs when the individual’s wishes and needs are sacrificed for the smooth running of a group, service or organisation.

[Organisational or Institutional Abuse - Buckinghamshire Safeguarding Adults Board \(buckssafeguarding.org.uk\)](#)

Psychological

Physical abuse, also known as mental or **emotional abuse**, involves using verbal and non-verbal communication to try to control someone or harm them emotionally. Though psychological abuse doesn’t leave bruises and broken bones, it can cause severe emotional issues and mental health conditions.

[Psychological Abuse: Types, Impact, and Coping Strategies \(verywellmind.com\)](#)

Physical abuse

abuse can be defined as any deliberate act of force against another person that results in harm, injury, or trauma to that person’s body. This can involve hitting, shaking, throwing, poisoning, punching, kicking, scalding, burning, drowning, and suffocating. It may have serious consequences that affect the well-being of the survivor, and in some cases, it can bring about psychological conditions and complications. It is often used as a tactic for one person to gain control over another. It can also result when a person deliberately causes the ill health of another to seek attention through fabricated or induced illness. This was previously known as Munchausen’s Syndrome by Proxy.

[What Is Physical Abuse And How Do You Identify A Person Experiencing Abuse? | BetterHelp](#)

Radicalisation

Radicalisation) is the process by which an individual or a **group** comes to adopt increasingly **radical** views in opposition to a political, social, or religious **status quo**.

[Radicalization - Wikipedia](#)

Self-neglect

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Self-neglect is a behavioural condition in which an individual neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have. More generally, any lack of self-care in terms of personal health, hygiene and living conditions can be referred to as self-neglect. Extreme self-neglect can be known as Diogenes syndrome. There are two types of self-neglect: intentional (active), and non-intentional (passive). Intentional self-neglect occurs when a person makes a conscious choice to engage in self-neglect. Non-intentional self-neglect occurs as a result of health-related conditions that contribute to the risk of developing self-neglect.

[Self-neglect - Wikipedia](#)

Sexual abuse

Sexual abuse is any sexual activity that occurs without consent; it can involve forcing or enticing a person to take part in sexual activities, whether or not they are aware of what is happening. This may include physical contact both penetrative and non-penetrative or viewing pornographic material including through the use of the internet. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Indicators of sexual abuse include allegations or disclosures, genital soreness, injuries or disclosure, sexually transmitted diseases, inappropriate sexualised behaviour, including words, play or drawing.

Trafficking

Trafficking is defined by the movement of a person, and this can happen within a single country or even within a single community. What trafficking really means is people groomed and forced into sexual exploitation; people tricked into accepting risky job offers and trapped in forced labour in building sites, farms or factories. It means being recruited to work in private homes only to be trapped, exploited and abused behind closed doors with no way out. It's a serious crime and a grotesque abuse of the people it affects. Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud, coercion or deception, with the aim of exploiting them for profit.

[What is human trafficking? - Anti-Slavery International \(antislavery.org\)](#)

Upskirting

Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales.

[Upskirting: know your rights - GOV.UK \(www.gov.uk\)](#)

Policy Date

This policy was agreed and disseminated on 19th September 2024 and will be reviewed annually or when there are substantial organisational changes.