



Safeguarding Children and Young People and Child Protection Policy

senSI Reference No	Version 7.0
Main points the document covers	This policy outlines senSI's responsibilities and procedures for safeguarding and promoting the welfare of children and young people, including recognising, responding to, and reporting abuse or neglect, in accordance with UK legislation, statutory guidance, CQC requirements, and local safeguarding partnership arrangements.
Who is the document aimed at?	All employees, contractors, students, volunteers and visiting professionals.
Owner	Annie Crofton and Emma Jerman
Responsibility	Registered Manager or Equivalent
Author	Charlotte Polland
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Distribution	
Who will the policy be distributed to	All employees, contractors, students, volunteers and visiting professionals.
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Related Documents	Safeguarding Adults Policy Mental Capacity Act and Consent Policy Safer Recruitment and DBS Policy Whistleblowing Policy Prevent Duty Policy Data Protection Policy Code of Conduct
Requirement	Legal Guidance National Guidance Professional Guidance



Key Words	Safeguarding, Protection, Children, Welfare, Reporting
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1. Policy Statement

senSI is committed to safeguarding and promoting the welfare of children and young people. We recognise our legal and moral responsibility to protect them from harm and provide an environment in which children feel safe, valued, and respected.

This policy sets out how senSI will meet its duties under the Children Acts 1989 and 2004, the Working Together to Safeguard Children 2023 guidance, and CQC Regulation 13.

Our safeguarding culture aligns with the six principles of safeguarding and the CQC Key Questions to ensure care that is Safe, Effective, Caring, Responsive, and Well-Led.

2. Purpose and Scope

This policy applies to all senSI staff, therapists, contractors, volunteers, and visiting professionals.

It covers all children and young people (under 18) who access our therapy services or come into contact with staff through home visits, community settings, or online sessions.

3. Legal and Regulatory Framework

This policy is based on and compliant with:

- Children Act 1989 and 2004
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2024)
- Care Act 2014 (transitions from childhood to adulthood)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Serious Crime Act 2015 (FGM mandatory reporting duty)
- Domestic Abuse Act 2021
- Data Protection Act 2018 / UK GDPR
- Human Rights Act 1998
- Equality Act 2010
- CQC Regulation 13 – Safeguarding service users from abuse and improper treatment

4. Principles of Safeguarding Children and Young People

1. **Welfare first:** The welfare of the child is paramount.
2. **Prevention:** Early help and intervention prevent harm.
3. **Partnership:** Safeguarding is everyone's responsibility.
4. **Protection:** Children at risk are protected through timely, proportionate action.
5. **Empowerment:** Children and families are listened to and involved in decisions.



6. Accountability: Staff are clear about roles and expectations.

5. Definitions

- Child / Young Person: Anyone under the age of 18.
- Safeguarding: Protecting children from maltreatment, ensuring safe care, and preventing impairment of health or development.
- Child Protection: Specific procedures to protect individual children suffering or likely to suffer significant harm.
- Abuse: Physical, emotional, sexual, and neglect; also includes exploitation, online abuse, radicalisation, FGM, and domestic abuse.

6. Roles and Responsibilities

Designated Safeguarding Leads – Annie Crofton & Emma Jerman

- Lead on all safeguarding and child protection matters.
- Liaise with Local Authority Children’s Services and safeguarding partners.
- Ensure compliance with statutory guidance and CQC requirements.
- Provide safeguarding supervision, staff support, and training.

Deputy DSL – Sam Smith

- Acts for the DSLs when absent and supports day-to-day management of concerns.

All Staff and Professionals

- Read and understand this policy and Part 1 of KCSIE (2024).
- Complete safeguarding and Prevent training at induction and annually.
- Report all concerns or disclosures immediately to the DSL/Deputy DSL.

7. Safer Recruitment and Vetting

senSI follows Safer Recruitment procedures to prevent unsuitable individuals from working with children. All staff, contractors, and volunteers:

- Have an enhanced DBS check (including barred list).
- Provide verified references and qualification evidence.
- Are subject to identity and right-to-work checks.

Recruitment follows CQC Regulation 19 and the DBS Code of Practice.

8. Recognising Abuse and Neglect

All staff must be alert to indicators of abuse including:

- **Physical:** injuries or marks inconsistent with explanation.
- **Emotional:** withdrawal, fear, or changes in behaviour.
- **Sexual:** inappropriate language, behaviour, or physical indicators.
- **Neglect:** poor hygiene, malnutrition, or failure to thrive.



Staff must also recognise contextual and online risks, including child-on-child abuse, exploitation, and radicalisation.

9. Mental Capacity, Consent, and the Voice of the Child

Children and young people have the right to be listened to and involved in decisions that affect them. Staff must take into account the child's views, wishes, feelings, communication needs, culture, and preferred method of expression in all safeguarding and care decisions.

Consent should be sought in a manner appropriate to the child's age, understanding, and developmental level. Staff should work in partnership with parents/carers wherever appropriate while recognising the rights, dignity, and autonomy of the child or young person.

For young people aged 16–17, the Mental Capacity Act 2005 applies. It must be presumed that a young person has capacity to make decisions unless it is established otherwise. Any assessment of capacity must be decision-specific, proportionate, and appropriately recorded.

For children under the age of 16, staff should consider whether the child is Gillick competent. Gillick competence refers to a child having sufficient maturity and understanding to make decisions about their own care or treatment without parental permission or knowledge. In assessing Gillick competence, staff should consider:

- the child's age, maturity, and emotional development;
- their ability to understand the information relevant to the decision;
- whether they can understand the risks, benefits, and potential consequences involved;
- their ability to retain and weigh the information provided;
- their ability to communicate their decision clearly; and
- whether the decision is being made voluntarily and free from pressure or influence.

Where a child is assessed as Gillick competent, their views and decisions should normally be respected unless there are safeguarding concerns, risk of significant harm, or legal requirements that necessitate information sharing or intervention.

Information shared by a Gillick competent child should generally be treated as confidential. However, confidentiality may be overridden where there are safeguarding concerns, risk of abuse or exploitation, or where sharing information is necessary to protect the child or others from harm.

Where a child under 16 is assessed as not Gillick competent, consent should usually be sought from a person with parental responsibility unless emergency treatment or safeguarding considerations apply.



Staff must seek advice from the Designated Safeguarding Lead (DSL), Deputy DSL, or appropriate healthcare professionals where there is uncertainty regarding consent, competence, confidentiality, or safeguarding risk.

Staff must not assume that silence, compliance, or lack of objection indicates consent or safety.

10. Prevent Duty and Contextual Safeguarding

Under the Prevent Duty (2015), senSI will identify and refer individuals vulnerable to radicalisation. Staff will also consider the broader environment - home, community, online - in assessing risk. DSLs will liaise with the Local Prevent Lead or Channel Panel where necessary.

Where concerns arise that a child or young person may be vulnerable to radicalisation, DSLs will consider referral to the Channel Programme and seek advice from the local Prevent team in accordance with Prevent Duty Guidance. All Prevent concerns, advice sought, decisions made and referrals undertaken will be appropriately documented.

11. Multi-Agency Working

11.1 Partnership Working

senSI works in partnership with Local Safeguarding Children Partnerships (LSCPs) across Norfolk, Suffolk, Cambridgeshire, and Peterborough. DSLs contribute to multi-agency meetings, Early Help Assessments, and Child Protection Conferences.

11.2 Information Sharing

We share information lawfully under the Information Sharing Guidance 2023 and Working Together principles.

11.3 Communication with Commissioners

Where children and young people are placed or commissioned by schools, local authorities or other agencies, senSI will inform the relevant commissioner without delay of any safeguarding concern, allegation, disclosure, incident or referral involving that child, unless doing so would place the child at increased risk of harm or would be contrary to advice received from Children's Services, Police or other statutory agencies.

The name of the professional contacted, method of communication, date and time of contact, advice received and actions agreed will be recorded within safeguarding documentation.

11.4 Children Supported Through Virtual School/TES



Where children are supported through the Transitional Education Service, Virtual School or are looked after or previously looked after, safeguarding concerns will also be communicated without delay to the relevant adviser, social worker or named professional, unless doing so would increase risk to the child or conflict with statutory advice.

11.5 Electively Home-Educated Children

Although senSI does not currently support any electively home-educated children through its Alternative Provision offer, the organisation recognises that such referrals may arise in the future. Where safeguarding concerns relate to an electively home-educated child, senSI will follow its safeguarding procedures, seek advice and make referrals to the Children's Advice and Duty Service (CADS) as appropriate, and notify Norfolk Services to Home Educators where relevant and in accordance with local safeguarding arrangements.

12. Safeguarding and Child Protection Procedure

1. Immediate Action:

- If a child is at immediate risk, call 999.
- Ensure safety and inform DSL/Deputy DSL.

1.1 Unexpected Non-Collection:

Where a child or young person is not collected at the agreed time, or is unexpectedly left in our care, staff must follow the procedure set out in Section 20 of this policy: Procedure for Children Not Collected / Unexpectedly Left in Our Care.

This includes ensuring the child's immediate safety, attempting contact with parents/carers and emergency contacts, notifying the DSL/Deputy DSL, and escalating concerns to Children's Services, Emergency Duty Team, or the Police where appropriate.

All incidents, actions taken, and escalation decisions must be recorded using the Safeguarding Concern Form (Appendix 2).

2. Internal Reporting:

- Report all concerns to DSL or Deputy DSL immediately.
- Record concerns on the Safeguarding Concern Form (Appendix 2).

3. DSL Action:

- Assess risk, consult with CADS (Children's Advice and Duty Service) or Children's Services within 24 hours.
- Make referral where criteria are met for Section 47 (significant harm) or Section 17 (child in need).

4. Allegations Against Staff:

Any concern that an adult working with children may have:



- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm,

must be reported immediately to the DSL.

If the concern relates to a DSL or Director, advice must be sought directly from the Norfolk Duty Desk (LADO triage service):

Telephone: 01603 307797

Advice received from the Duty Desk (LADO triage service), decisions taken and subsequent actions must be fully recorded.

5. Recording:

- Maintain clear, factual, dated records separate from client notes.

6. Follow-Up:

- DSL to liaise with agencies and review outcomes.

13. Information Sharing and Record Keeping

senSI complies with Data Protection Act 2018 and UK GDPR. Information is shared without consent when there is risk of significant harm. Safeguarding records are:

- maintained separately from routine clinical and educational records;
- securely stored with access restricted to authorised safeguarding personnel only;
- held electronically within secure, password-protected systems using role-based access controls;
- stored in locked cabinets within secure offices where paper records are retained;
- transferred securely when information sharing is required; and
- retained in accordance with statutory retention requirements, organisational procedures and data protection legislation.

A clear chronology of safeguarding concerns, actions taken, referrals made and communications with external agencies will be maintained.

13.1 Behaviour and Incident Reporting

Accident, incident and behaviour-related events are recorded using senSI's digital reporting system (BrightSafe). Where an incident involves a child or young person commissioned by a school, local authority or other placing authority, records will include whether the commissioning organisation was informed, including:

- who was contacted;
- the date and time of contact;
- the method of communication; and



- any advice received or actions agreed.

This ensures that placing authorities remain appropriately informed of incidents relevant to the child's welfare, safety and support arrangements.

14. Online Safety

senSI recognises online abuse as a safeguarding risk. Children and families are educated about safe online behaviour and supported to use technology responsibly. Any concerns involving online contact, harmful content, or exploitation are treated as safeguarding matters.

15. Whistleblowing and Escalation

Staff can raise safeguarding concerns internally with DSLs or externally via:

- **CQC:** 03000 616161
- **NSPCC Whistleblowing Helpline:** 0800 028 0285

Professional challenge is encouraged where decisions are disputed, following the Local Escalation Procedure.

16. CQC Notifications

Under Regulation 18, senSI will notify CQC within 24 hours of:

- Any abuse or allegation involving a child using the service.
- Any police involvement due to safeguarding concerns.

17. Audit, Training, and Continuous Improvement

- DSLs review safeguarding activity quarterly.
- Annual safeguarding audit completed for governance.
- All staff complete a minimum of Level 2 safeguarding and Prevent training.
- DSLs and the Deputy DSL hold safeguarding training appropriate to their role and responsibilities, currently Level 4 safeguarding training, and undertake regular updates to maintain competence and awareness of emerging safeguarding risks and local procedures.

18. Governance and Monitoring

Directors receive quarterly safeguarding reports. The policy is reviewed annually or sooner following legislative or procedural change.

19. Specific Safeguarding Risks – FGM, Forced Marriage, Child Exploitation, Serious Violence

- FGM: Mandatory reporting to the police where a case is known or suspected.



- Forced Marriage: Concerns reported to DSL; immediate referral to police/CADS.
- Child Sexual or Criminal Exploitation (CSE/CCE): Treated as child protection; multi-agency referral required.
- Serious Violence / County Lines: Staff to recognise indicators of gang exploitation and report immediately.

20. Procedure for Children Not Collected / Unexpectedly Left in Our Care

senSI recognises that on rare occasions a child or young person may be left in our care beyond their agreed session time, or a parent/carer may fail to return as expected. This constitutes a safeguarding concern, and appropriate, timely action is required to ensure the child's safety and welfare. This procedure applies to all children, including those supported privately and those subject to adoption, fostering, SGO, or Local Authority care arrangements.

20.1 Immediate Safety

- The child must remain with a member of staff at all times in a safe, appropriate environment.
- Wherever possible, two members of staff should be present.
- Staff must not transport a child in their own vehicle unless expressly authorised by the DSL and covered by risk assessment, policy, and insurance.

20.2 Attempting Contact

Staff will:

1. Contact the parent/carer using the primary contact details.
2. If unsuccessful within **10–15 minutes**, attempt all additional emergency contacts.
3. For children who are Looked After, adopted, fostered or under an SGO:
 - Contact the allocated Social Worker or, if unavailable, the **Children's Advice and Duty Service (CADS)/Duty Team** immediately
 - For out-of-hours, contact the **Emergency Duty Team** listed in Appendix 1.

All attempts at contact must be recorded, including times and outcomes.

20.3 Escalation

If no responsible adult can be contacted and the child has not been collected within **30–45 minutes**, or there are concerns about the child's welfare:

- The DSL/Deputy DSL must be informed immediately.
- The situation becomes a **safeguarding incident** under this policy.
- The DSL will:
 - Assess risk,
 - Contact Children's Services / CADS as appropriate,
 - Seek advice and follow local safeguarding procedures.



If the child appears abandoned or there is immediate concern for safety, staff should call **999**.

20.4 Children in Local Authority Care

For children placed under fostering, adoption, SGO or other Local Authority oversight:

- Any non-collection must be reported to the child's Social Worker as a safeguarding concern.
- If the foster placement or care arrangement is potentially unstable or at risk of breakdown, DSLs must follow Local Authority escalation protocols.

20.5 When the Parent/Carer Arrives

Staff should:

- Reassure the child.
- Explain the concern clearly and factually to the parent/carers.
- Ask for any changes to contact details or collection arrangements.
- DSLs will consider whether the incident triggers:
 - a safeguarding referral,
 - a professional conversation with the placing authority,
 - or a notation on the child's risk record.

20.6 Recording

A written record must be completed using the **Safeguarding Concern Form (Appendix 2)**, including:

- Timeline of events and attempted contacts
- Actions taken
- Escalation decisions
- How and by whom the child was collected

Records must be stored securely in accordance with Section 13 of this policy.

20.7 Review and Learning

The DSL will review each incident to identify patterns, emerging risks of neglect, or concerns within fostering/adoption arrangements. Learning will be incorporated into supervision, training, and safeguarding audits.



Appendix 1: Local Authority Safeguarding Contacts

Area	Contact	Out of Hours / Emergency
Norfolk (CADS)	Children's Advice and Duty Service (CADS) – 0344 800 8020	0344 800 8020
Norfolk (LADO)	Duty Desk (LADO Triage Service) – 01603 307797	N/A
Suffolk	0808 800 4005	0808 800 4005
Cambridgeshire	MASH – 0345 045 5203	01733 234724 (Emergency Duty Team)
Peterborough	MASH – 0345 045 5203	01733 234724 (Emergency Duty Team)
Police (non-emergency)	101	Emergency: 999



Appendix 2: Safeguarding Concern Form (Template)

This form must be completed as soon as possible after a safeguarding concern, disclosure, or incident.

Complete all sections clearly and factually. Do not delay reporting while waiting for full information.

Section 1 – Details of Person at Risk

- Full Name:

- Date of Birth / Age:

- Address / Location:

- Contact Number (if applicable):

- Primary Need / Disability / Diagnosis (if relevant):

- Next of Kin / Carer / Advocate:

Section 2 – Details of the Concern

- Date and Time of Incident / Disclosure:

- Location of Incident:

- Description of Concern / Incident (include what was seen, heard, or said):



- Immediate Actions Taken (e.g. first aid, emergency call, reassurance):

Section 3 – Person Reporting the Concern

- Full Name:

- Job Title / Role:

- Date and Time Report Completed:

- Signature:

Section 4 – Reported To (Designated Safeguarding Lead / Deputy)

- Name of DSL / Deputy:

- Date and Time Reported:

- Actions / Decisions by DSL / Deputy:

Was a referral made to the Local Authority Safeguarding Team? Yes No

Date/time: _____

Name of person referral made to: _____

Commissioner Notification (where applicable)

Was the commissioning school/local authority informed? Yes No Not Applicable

Name of commissioning school/local authority:



Name and role of professional contacted:

Date/time informed: _____

Method of communication:

Telephone Email Meeting Other _____

Advice received / actions agreed:

Was the CQC notified? Yes No

Date/time: _____

Were the Police contacted? Yes No

Incident/Ref no.: _____

Section 5 – Follow-Up / Outcome

- Outcome / Feedback from Local Authority / Other Agencies:

- Further Actions Required:

DSL / Deputy Signature: _____ Date: _____



Confidentiality Notice

This form contains sensitive safeguarding information. Completed forms must be stored securely in accordance with senSI's Data Protection and Record Keeping Policy and accessible only to authorised safeguarding personnel.



Appendix 3: Key Legislation and Guidance

- Children Act 1989 & 2004
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2024)
- Care Act 2014
- Serious Crime Act 2015 (FGM)
- Domestic Abuse Act 2021
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Information Sharing Guidance (2023)
- Human Rights Act 1998
- Equality Act 2010
- CQC Fundamental Standards (Regulation 13)



Appendix 4: Safeguarding Procedure Flowchart

1. Concern identified → ensure immediate safety / call 999 if urgent.
2. Report to DSL / Deputy DSL and record concern.
3. DSL assesses → refer to CADS/Children's Services within 24 hrs if required.
4. DSL notifies CQC (if applicable).
5. Maintain records and monitor outcomes.
6. Share learning via supervision and training.



Appendix 5: Safeguarding Children at senSI – Quick Reference Guide

If you're worried about a child:

- **Act immediately.**
- Ensure safety, record facts, and tell the DSL.
- **DSLs:** Annie Crofton / Emma Jerman **Deputy:** Sam Smith

Contact Numbers:

- Norfolk | Children's Advice and Duty Service (CADS): 0344 800 8020
- Norfolk | Duty Desk (LADO triage service): 01603 307797 (concerns about adults working with children)
- Suffolk 0808 800 4005
- Cambridgeshire 0345 045 5203
- Peterborough 01733 864180
- **Police:** 999 (emergency) / 101 (non-emergency)

Prevent/Channel concerns: discuss with the DSL who will seek advice and refer where appropriate.

Remember:

- The welfare of the child is paramount.
- Do not promise confidentiality.
- Record only factual information.
- Report all concerns, however small.

If a child has been commissioned by a school, local authority or other placing authority, ensure that the relevant commissioner is informed without delay, unless advised otherwise by statutory agencies.



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Version Control			
Revision Date	Summary of Changes	Author(s)	Version No.
October 2025	This version includes updates to reflect current UK legislation, statutory guidance, and CQC requirements. Key changes include revised terminology aligned with <i>Working Together to Safeguard Children (2023)</i> , expanded sections on multi-agency working, Prevent Duty, and safer recruitment, and the inclusion of up-to-date Local Authority safeguarding contact details for Norfolk, Suffolk, Cambridgeshire, and Peterborough. The policy has also been aligned in structure and tone with senSI's <i>Safeguarding Adults Policy</i> to ensure consistency across safeguarding governance.	Charlotte Polland	4.0
November 2025	Added a new safeguarding provision relating to the unexpected non-collection of children and young people. This includes insertion of a brief paragraph within Section 12 outlining required staff actions, escalation to DSL/MASH, and recording expectations. This update strengthens safeguarding procedures in line with <i>Working Together to Safeguard Children (2023)</i> and reflects best practice for children in private, adoptive, foster, or SGO arrangements.	Charlotte Polland	5.0
May 2026	Expanded Section 9 to include guidance on Gillick competence, consent, confidentiality, parental responsibility, and the Mental Capacity Act 2005 for young people aged 16–17. Updated Section 12, point 1.1. to remove duplication and cross-reference the detailed non-collection procedure contained within Section 20.	Charlotte Polland	6.0
June 2026	Updated to strengthen safeguarding arrangements in line with Norfolk Alternative Provision expectations. Changes include enhanced guidance on communication with commissioning schools and local authorities, Norfolk-specific contact information (including CADS and the Duty Desk/LADO triage service), additional detail regarding Prevent referrals, secure safeguarding record keeping, and amendments to safeguarding recording processes to capture communications with placing authorities. Clarification was also added regarding arrangements for electively home-educated children and children supported through the Virtual School and Transitional Education Service.	Charlotte Polland	7.0



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References:

Care Act 2014

Care and Support Statutory Guidance (Department of Health and Social Care, 2023)

Children Act 1989

Children Act 2004

Counter-Terrorism and Security Act 2015 (Prevent Duty)

Data Protection Act 2018 and UK General Data Protection Regulation (GDPR)

Domestic Abuse Act 2021

Education Act 2002 (Section 175 – duty to safeguard and promote welfare)

Equality Act 2010

Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)

Forced Marriage (Civil Protection) Act 2007

Home Office (2023). *Forced Marriage and Honour-Based Abuse Guidance*

Home Office (2023). *Multi-Agency Statutory Guidance on Female Genital Mutilation*

Home Office (2023). *Prevent Duty Guidance for England and Wales*

HM Government (2023). *Information Sharing: Advice for Safeguarding Practitioners*

HM Government (2023). *Tackling Child Exploitation Strategy*

Human Rights Act 1998

Keeping Children Safe in Education (Department for Education, 2024)

Mental Capacity Act 2005 and Code of Practice

NHS England (2024). *Safeguarding Children, Young People and Adults at Risk: National Framework*

NSPCC (2024). *Definitions and Signs of Child Abuse*

Safeguarding Vulnerable Groups Act 2006

Serious Crime Act 2015 (sections on FGM)

Social Care Institute for Excellence (SCIE) (2023). *Safeguarding Children and Young People – Practice Guidance*

Working Together to Safeguard Children (Department for Education, 2023)

Care Quality Commission (2024). *Safeguarding People: CQC Guidance for Providers*



Care Quality Commission (2024). *Fundamental Standards – Regulation 13: Safeguarding Service Users from Abuse and Improper Treatment*

Norfolk Safeguarding Children Partnership – www.norfolkscp.org.uk

Suffolk Safeguarding Partnership – www.suffolksp.org.uk

Cambridgeshire & Peterborough Safeguarding Children Partnership Board – www.safeguardingcambspeterborough.org.uk

Norfolk County Council. Children's Advice and Duty Service (CADS)

Norfolk County Council. Duty Desk (LADO triage service)

Norfolk County Council. Services to Home Educators

Norfolk County Council. Virtual School for Children in Care and Previously in Care

Norfolk County Council. Transitional Education Service