Safeguarding and Child Protection Policy and Procedures

Key Safeguarding contacts

Any concerns of a safeguarding nature should be immediately reported to the SEND & Inclusion Safeguarding DSLs or Deputy DSLs who can be contacted on:

Designated Safeguarding Lead:
Linda Chapman: 07464 673351 / linda.chapman@fleeteducationservices.com

Deputy Designated Safeguarding Lead team:
Sarah Atkinson: 020 3048 3513 ext. (80154) / sarah.atkinson@tp-tutors.com
Rebecca Hawksworth: 01252 386008 / rebecca.hawksworth@fleeteducationservices.com
Ruth Brace: 01252 386019 / ruth.brace@fleeteducationservices.com
Amy Harding: 01252 386041 / amy.harding@fleeteducationservices.com
Phoebe Irlam: 020 8145 8244 / phoebe.irlam@teachingpersonnel.com
Chloe Shirley: 020 4515 1281 / chloe.shirley@fleeteducationservices.com

SEND & Inclusion Safeguarding Email: sisafeguarding@supportingeducation.com
Phone: 01252 386007

Reporting a concern:
https://form.thesafeguardingcompany.com/aee7f402-6072-477f-a94e-cd636d5eaf14

Managing Director – SEND & Inclusion Practice – Dave Burchett – 07938 600672

NSPCC Helpline
0808 800 5000
Childline
0800 1111

This is a core policy that forms part of the induction for all staff and educators. It is a requirement that all members of staff and educators have access to this policy and sign to say they have read it, understood it and will abide by the contents. It will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

If a child or vulnerable adult is in immediate danger you should dial 999.

Contents

Key Safeguarding contacts 1
1. Introduction and Ethos 4
2. Aims of the Safeguarding and Child Protection Policy and Procedures 6
2.1 Policy Context 6
This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes: 6
2.2 Covid 19 7
2.3 Definitions of Safeguarding 7
3. Safeguarding and the Welfare of Children at TP Tutors 8
3.1 TP Tutors' Commitments 8
3.2 Referral to appropriate authorities 9
3.3 Risk Assessments 9
3.4 Complaints 10
4. Roles and Responsibilities 10
4.1 Designated Safeguarding Lead (DSL) 10
4.2 Members of Staff/Educators 11
4.3 Children and Vulnerable Adults 13
4.4 Parents and Carers 13
5. Confidentiality and Information Sharing 13
6. Supporting Staff/Educators 15
7. Safer Practice 15
7.1 Staff/Educator Induction and Training 15
7.2 Allegations/Concerns against Staff or Educators 16
7.2.1 Harm Thresholds 18
7.3 DBS Referral 18
8. Code of Conduct 18
8.1 Learner/Educator Relationship 20
8.2 De-escalation Strategies 21
8.3 Restrictive interventions and use of reasonable force 21
8.4 Anti-Bullying 23
8.5 Online Safety and Use of Digital Technology 23
8.5.1 Generative AI 25
8.6 Tuition Setting and Environment 26
8.7 Whistleblowing 27
9. Safer Recruitment 28
9.1 General principles 28

9.2 Checks to be carried out 29
9.3 References 30
9.4 DBS checks 30
10. Policy Compliance, Monitoring and Evaluation 31
11. Record Keeping 31
12. Multi-Agency Working 32
13. Safeguarding Children with Special Educational Needs and Disabilities 32
14. Safeguarding Vulnerable Groups 33
14.1 Children or vulnerable adults who have a social worker 33
14.2 Looked after children (LAC) 33
15. Security 34
Appendix 1 Recognising Signs of Abuse, Neglect and Exploitation 36
A1.1 Abuse, Neglect and Exploitation 36
A1.2 Signs of Abuse in Children and Vulnerable Adults 37
A1.3 Risk Indicators: 37
A1.4 Recognising Physical Abuse 37
A1.5 Recognising Emotional/Psychological Abuse 38
A1.6 Recognising Sexual Abuse 39
A1.7 Recognising Neglect 40
Appendix 2 Specific Types of Abuse 41
A2.1 Mental Health 41
A2.2 Child Criminal Exploitation (CCE) 41
A2.3 CSE Child Sexual Exploitation (CSE) 42
A2.4 Nude and/or Semi-nude Image Sharing by Children / 'Sexting' 43
A2.5 Serious Violence/Gangs 43
A2.6 Knife Crime 44
A2.7 County Lines 44
A2.8 Child-on-child Abuse 45
A2.9 Sexual Violence and Sexual Harassment Between Children 46
A2.10 Incel Ideology 47
A2.11 Domestic Abuse 48
A2.12 Honour or Faith-based Abuse (HBA) Violence Against Women and Girls (VAWG) 49
A2.13 Female Genital Mutilation (FGM) 49
A2.14 Forced Marriage 51
A2.15 Child Trafficking and Modern Slavery 51
A2.16 Preventing Radicalisation - The PREVENT Duty 51

A2.17 Channel 53
A2.18 Cybercrime 53
A2.19 Children who are Absent from Education, Home or Care 54
A2.20 Institutional / Organisational Abuse 54
A2.21 Financial or Material Abuse 54
A2.22 Discriminatory Abuse 55
Appendix 3 Safeguarding and Child/Vulnerable Adult Protection Procedures 56
A3.1 Responding to a Concern 56
A3.2 Action to be taken by DSL 57
A3.3 Reporting the Sharing of Nudes and Semi-nude Imagery 58
A3.4 Action to be taken by DSL regarding the sharing of Nudes and Semi-nude Imagery 58
A3.5 Disclosure 59
Useful Resources and Websites 60
Appendix 4 - Designated Safeguarding Lead 61
A4.1 List of Duties 61
A4.2. DSL Procedure 62
Appendix 5 63
Restrictive Intervention / Reasonable Force Record 63
Submit the completed form to: sisafeguarding@supportingeducation.com 63
1. Description of Incident 63
2. Reason for Intervention 63
3. Type of Intervention Used 64
4. Outcome 64
5. Injuries or Distress 64
6. Follow-Up Actions 64
7. Educator Reflection 65
Declaration 65

1. Introduction and Ethos

TP Tutors recognises our statutory responsibility to safeguard and promote the welfare of all children (defined as everyone under the age of 18) and vulnerable adults. Safeguarding is everybody's responsibility, and all those directly connected (staff, educators, directors, parents, families and learners) are an important part of the wider safeguarding system and have an essential role to play in making children and vulnerable adults safe and secure.

- The welfare of children and vulnerable adults is paramount in all the work we do and in all the decisions made.
- Where safeguarding is concerned, staff and educators at TP Tutors are advised to maintain an attitude of 'it could happen here'. When concerned about the welfare of a child or vulnerable adult, staff will always act in the best interests of the child or vulnerable adult.
- TP Tutors promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of safeguarding responsibilities.
- TP Tutors believes that the best interests of children and vulnerable adults always comes first. All children and vulnerable adults have a right to be heard and to have their wishes and feelings taken into account, and all children, regardless of age, disability, gender, race, religion or belief, sex or sexual orientation/identity have an equal right to protection from all types of harm or abuse.
- All TP Tutors staff believe that the service provided through tuition should provide a caring, positive, safe and stimulating environment that promotes the academic, social, physical and moral development of the individual. We recognise the importance of promoting an environment that helps children and vulnerable adults be and feel safe.
- Children and vulnerable adults are respected and encouraged to speak openly within a culture where young people can speak out or share their concerns with staff.
- We will ensure children's and vulnerable adults' wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- All our staff understand safe professional practice and adhere to our safeguarding policies.

Our core safeguarding principles are:

- **Prevention** - positive, supportive, safe culture, curriculum and pastoral opportunities, safer recruitment procedures.
- **Protection** - following the agreed procedures, ensuring all staff and educators are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- **Support** - for all learners, educators, staff, and where appropriate specific interventions are required for those who may be at risk of harm.
- **Working with parents and other agencies** - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

Safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. (KCSIE Sept 2026)

This guidance should be read alongside:
Statutory guidance: Working Together to Safeguard Children

https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
and
What to do if you are worried a child is being abused: advice for practitioners:
https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

2. Aims of the Safeguarding and Child Protection Policy and Procedures

TP Tutors will endeavour to safeguard children and vulnerable adults by:

- Adopting child and vulnerable adult protection guidelines through a code of behaviour for staff and educators.
- Sharing information about child and vulnerable adult protection, safeguarding and good practice with children, vulnerable adults, parents/carers, staff and educators (see appendices).
- Sharing information with agencies who need to know about concerns and involving parents/carers, children and vulnerable adults as appropriate.
- Following carefully the procedures for safer recruitment and selection of staff and educators.
- Providing effective management and support for staff and educators through supervision and training.
- Providing a working environment in which children and vulnerable adults feel safe, secure, valued and respected so they feel confident and know how to approach adults if they are in difficulties, believing they will be listened to.
- Ensuring communication between educators, managers, DSLs, clients and external agencies (Designated Officer (formerly LADO), Police, Social Care etc.).
- Reviewing the policy and procedures against government guidance, communicating updates regularly and updating the policy annually.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2026 (KCSIE) which requires individual schools and colleges to have an effective Child Protection Policy.

The procedures contained in this policy apply to all staff, including directors, educators, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2026.

2.1 Policy Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:

- DfE Keeping Children Safe in Education – Sept 2026 (KCSIE)
- Working Together to Safeguard Children 2026 (WTSC)
- Framework for the Assessment of Children in Need and their Families 2000

- The Education Act 2002
- Modern Slavery Act 2015
- Ofsted: Education Inspection Framework 2021
- Channel Duty Guidance. Protecting vulnerable people from being drawn into terrorism (2015).
- Mental Capacity Act 2005.

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are learners under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

2.2 Covid 19

We acknowledge that as a result of Covid 19 some learners may have been exposed to a range of adversity and trauma, including bereavement, anxiety, stress or low mood, and in some cases increased welfare and safeguarding risks. We are aware that these learners may be experiencing a variety of emotions in response to the coronavirus. This may particularly be the case for vulnerable children and adults.

- All staff members and educators will be vigilant about the possible continued impacts of the pandemic on learners' mental wellbeing, and act immediately on any safeguarding concerns, including new concerns where children and vulnerable adults are returning, and share their concerns with designated and deputy designated safeguarding leads.
- We are aware of the continued importance for our staff to work with and support social workers, the local authority Virtual School Heads for looked-after and previously looked-after children, children with a social worker and children in kinship care and any other relevant safeguarding and welfare partners.
- We will work with other agencies to ensure necessary services and support are followed to support learners.
- We will continue to ensure that arrangements are in place to keep children not physically attending school safe, especially online.
- All our staff who interact with children and vulnerable adults, including online, will continue to look out for signs a child or vulnerable adult may be at risk. Any such concerns will be dealt with as per this policy and where appropriate, referrals will continue to be made to relevant agencies. In relation to any child receiving remote education, see point 8.5 of this policy and separate Online Policy and Procedure.

2.3 Definitions of Safeguarding

In line with KCSIE 2026, safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children (includes everyone

under the age of 18) from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

TP Tutors acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse, neglect and exploitation
- Bullying (including cyberbullying)
- Children with family members in prison which increases the likelihood of absence, exclusion, mental ill health, substance misuse and negatively impacts success in education, training and employment in later life.
- Children who are absent from education - unexplainable and or/persistent absences from education – includes education, home and care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Sexual violence and sexual harassment
- County Lines
- Domestic abuse – the impact on children of seeing, hearing or experiencing the effects of domestic abuse
- Drugs and alcohol misuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Financially motivated sexual extortion
- Gangs and youth violence
- Hate crimes
- Homelessness
- Honour or faith-based based abuse
- Human trafficking and modern slavery
- Mental health
- Online safety
- Prejudice-based harm
- Serious violence
- Child-on-child abuse
- Private fostering
- Radicalisation and extremism
- Upskirting
- Youth produced sexual imagery or "Sexting".

(Also see Appendix 2 and Part One and Annex B - 'Keeping Children Safe in Education' 2026.)

3. Safeguarding and the Welfare of Children at TP Tutors

3.1 TP Tutors' Commitments

In order to ensure children and vulnerable adults are adequately protected, we are

committed to the following:

- We have a Designated Safeguarding Lead (DSL) and Deputy DSL team who are appropriately trained.
- All staff and educators are compliant with TP Tutors Safeguarding and Child Protection Policy and Procedure and are aware of the indicators of child abuse and how to respond to concerns or disclosures of abuse by children and vulnerable adults (including DBS check on recruitment and update service checked regularly).
- We take responsibility for providing help and support to meet the needs of children as soon as problems emerge whether that is within or outside the home, including online.
- A copy of our Safeguarding and Child Protection policy is available on the company website and on request.
- The Safeguarding and Child Protection policy is reviewed on an annual basis by the DSL.
- Training is provided on a regular basis and clear guidance available to all educators.
- The procedures are regularly tested and referrals monitored to ensure consistency and best practice.
- Recruitment procedures follow best practice and safer recruitment principles, with all checks in place prior to educators being assigned to a child or vulnerable adult.

3.2 Referral to appropriate authorities

TP Tutors will follow its own Child Protection policy and makes referrals as follows:

- Refer the child for an Early Help assessment. This includes viewing behaviour through a safeguarding lens and providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.
- Making a referral to statutory services as the child could be in need, is in need or is suffering, or likely to suffer harm.

TP Tutors will report all safeguarding concerns to commissioners, schools and other relevant referring organisations without delay and will agree who will take forward any necessary action. Information sharing and decision-making will be clearly recorded. TP Tutors will continue to review the response and, where necessary, escalate concerns further if this is required to protect the child or vulnerable adult or is in their best interests.

TP Tutors' DSL is committed to referring safeguarding concerns involving educators or staff to the relevant Designated Safety Officer (DSO), contributing to the assessment of a child or vulnerable adult's needs and, where appropriate, to on-going action to meet those needs.

3.3 Risk Assessments

TP Tutors will ensure sites are secure and suitable for children by completing a risk assessment for both home and community locations. The risk assessment will take

account of the individual child's needs and local factors relating to the location of the provision.
TP Tutors recognises its responsibilities when information is received from a commissioner that suggests there is a risk to others and/or an individual learner relating to behaviour or existing safeguarding concerns. The risk will be assessed and a support plan created to support the learner when they start tuition.

3.4 Complaints

- A child can make a complaint independently using the form contained in the induction pack.
- TP Tutors' Complaints Procedure is available on request from parent/carers, learners, staff or clients in the event they wish to report any concerns. This can be found securely stored on SEG People or https://fleeteducationservices.com/key-information
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff /educator will be dealt with following the process outlined in section 7.2 of this policy - Managing Allegations Against Staff.

4. Roles and Responsibilities

- Directors have read and will follow KCSIE guidance.
- The Directors will have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Managing Director will have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The Managing Director is the nominated director for safeguarding, who will support the DSL and have oversight in ensuring that TP Tutors has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- The Managing Director and senior leadership team will ensure that the Designated Safeguarding Lead is supported in their role and is provided with sufficient time so they can provide appropriate support to staff, children and vulnerable adults regarding any safeguarding and welfare concerns.

4.1 Designated Safeguarding Lead (DSL)

- TP Tutors has appointed a Designated Safeguarding Lead (DSL) and a team of Deputy Designated Safeguarding Leads (DDSL) who will have delegated responsibilities and act in the DSL's absence.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding systems, including online safety. Whilst the activities of the DSL may be delegated to the deputies, the ultimate responsibility for safeguarding remains with the DSL and this responsibility will not be delegated.

- The DSL will undergo appropriate and specific training including Prevent and Kinship training to provide them with the up to-date knowledge and skills required to carry out their role. The Deputy DSL is trained to the same standard as the DSL. The DSL and any deputy DSL training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The DSL will keep the Managing Director informed of ongoing safeguarding issues.
- The DSL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and educators regarding any new safeguarding and welfare concerns.
- The DSL (and deputies) will provide appropriate guidance and support to staff and educators regarding safeguarding and welfare concerns. This may include handling of referrals, supporting staff who made the referral and working with other agencies where appropriate.

The DSL will also:

- Act as the central contact point for all staff/educators to discuss/report any safeguarding concerns.
- Maintain a confidential recording system for safeguarding concerns.
- Ensure adequate and appropriate DSL cover arrangements in response to any disclosures and out of hours and/or out of term activities.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Represent or ensure TP Tutors is appropriately represented at multi-agency safeguarding meetings.
- Be available during term time (during school/TP Tutors working hours) for staff/educators to discuss any safeguarding concerns by phone and/or Teams or other such media.
- Provide regular updates to staff and educators on any changes in safeguarding guidelines or policy.
- Oversee safeguarding systems within the organisation including management of records, standards of recording concerns and referral processes.
- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or not made to another agency such as LA children's social care or the Prevent programme, etc.
- Appendix 4 of this policy fully outlines the duties of the DSL.

4.2 Members of Staff/Educators

All members of staff and educators have a responsibility to:

- Provide a safe environment in which children and vulnerable adults can learn.

- Complete a MyCommunity safeguarding concern form immediately if they have a concern.
- Call a member of the safeguarding team if they are concerned that a child is at immediate risk.
- Call the police in an emergency.
- Identify children who may benefit from early help.
- Understand the early help process and their role in it.
- Understand TP Tutors' safeguarding and child protection policy, staff code of conduct and reporting systems.
- Undertake annual and appropriate training which is regularly updated.
- Be aware of the process of making referrals to local authority children's social care and statutory assessment under the Children Act 1989.
- Know what to do if a child or vulnerable adult tells them that he or she is being abused, neglected or exploited and understand the impact abuse, neglect and exploitation can have upon a child or vulnerable adult.
- Reassure children or vulnerable adults who report concerns that they are being taken seriously and that they will be supported and kept safe.
- Be able to identify and act upon indicators that children or vulnerable adults are, or at risk of, developing mental health issues. The DSL or deputy will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children or vulnerable adults who may need help or protection.
- To recognise that indicators of abuse, neglect and exploitation do not automatically mean a child or vulnerable adult is being abused. However, all concerns should be taken seriously and referred to the DSL (or deputies) on a case-by-case basis.
- To be aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Indicators of abuse can vary from person to person. Children develop and mature at different rates, so what appears concerning behaviour in a younger child might be typical for an older child.
- To be alert to parental behaviours which can indicate abuse or neglect, so staff will be alert to parent-child/vulnerable adult interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

All staff and educators should be particularly alert to the potential need for early help for a child or vulnerable adult who:

- Is disabled and has specific additional needs.
- Has special educational needs (regardless of whether or not they have a statutory Education, Health and Care Plan).
- Is a young carer.

- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently absent from care or from home.
- Is at risk of modern slavery, trafficking or exploitation.
- Is at risk of being radicalised or exploited.
- Is in a family circumstance presenting challenges for the child/vulnerable adult, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.

4.3 Children and Vulnerable Adults

Children and vulnerable adults (learners) have a right to:

- Feel safe, be listened to and have their wishes and feelings taken into account.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Achieve academic success.
- Reach their full potential.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.
- Contribute to the development of safeguarding policies.

4.4 Parents and Carers

Parents/carers have a responsibility to:

- Be aware of, understand and adhere to, the relevant TP Tutors policies and procedures.
- Talk to their children or vulnerable adults about safeguarding issues and support TP Tutors in their safeguarding approaches.
- Identify behaviours which could indicate that their child or vulnerable adult in their care is at risk of harm, including online, and seek help and support from TP Tutors or other agencies.
- Request a copy of the Safeguarding and Child Protection Policy which is available on the TP Tutors website.

(See also Appendices 1 and 2.)

5. Confidentiality and Information Sharing

- TP Tutors recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to the protection of children or vulnerable adults at the earliest opportunity as per statutory guidance outlined within KCSIE 2026.

- All staff/educators must be aware that they cannot promise confidentiality in situations which might compromise a child or vulnerable adult's safety or wellbeing.
- All staff/educators must be aware that they cannot promise a child to keep secrets which might compromise the child or vulnerable adult's safety or wellbeing.
- Staff should always report safeguarding concerns in line with TP Tutors' safeguarding policy.
- It is generally good practice to share information with consent and, where possible, respect the wishes of those who do not consent to having their information shared.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children or vulnerable adults; this may include sharing information with the DSL and with other agencies as appropriate.
- Safeguarding decisions need to take into consideration the ability for children and vulnerable adults to make informed decisions as per the Mental Capacity Act (2005). If in doubt, staff/educators must contact the DSL/DDSL to determine the course of action that works in the child/vulnerable adult's best interest.
- You must always assume a person has capacity unless it is proved otherwise.
- You must take all practicable steps to enable people to make their own decisions.
- You must not assume incapacity simply because someone makes an unwise decision.
- Always act or decide for a person without capacity in their best interests.
- Carefully consider actions to ensure the least restrictive option is taken.
- There should be a clear route of escalation where a member of staff feels their safeguarding concern has not been responded to appropriately.
- TP Tutors has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure our compliance with all matters relating to confidentiality and information sharing requirements.
- The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2026).
- Staff/educators/DSL/DDSL will disclose information about a learner on a 'need to know' basis and will check with DSL/DDSL if unsure.

6. Supporting Staff/Educators

Educators/staff may experience anxiety, stress of other issues which may arise from concern for a child or vulnerable adult's welfare support. All staff will receive:

- An induction which will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a child's or vulnerable adult's safety or welfare.
- Access to TP Tutors' staff code of conduct.
- Appropriate supervision and support to ensure competence to carry out their responsibilities for safeguarding and promoting the welfare of children and vulnerable adults.
- Direct support from the DSL in their safeguarding role.
- Regular reviews of their own practice to ensure they improve over time. The DSL will also put staff in touch with outside agencies for professional support if they so wish, such as education support. https://www.educationsupport.org.uk/. Staff would be referred to Fleet's HR team who can arrange this support.

7. Safer Practice

Safer practice is essential for all staff and educators working with children/vulnerable adults. Safer practice affects all aspects of working with children/vulnerable adults and is everyone's responsibility. Adopting these methods can prevent unsuitable people from working with children and vulnerable adults and will also provide a framework process to investigate complaints against staff and educators appropriately. It will ensure all staff and educators conduct themselves in an appropriate manner. Safer practice should be exercised to minimise the risk to learners and to protect our staff and educators when they come into contact with children/vulnerable adults.

- The clear guidelines on safer working practice as outlined in our Code of Conduct (see Section 8) and throughout this policy will be adhered to by all staff and educators (including agency and temporary staff).
- All staff/educators will be made aware of the professional risks associated with the use of social media and electronic communication such as email, mobile phones, texting and social networking.

7.1 Staff/Educator Induction and Training

All members of staff have signed to confirm that they have been provided with Part 1 of KCSIE (Sept 2026) which outlines safeguarding information for staff. Those members of staff who do not work directly with children or vulnerable adults will be required to read Annex A (attached). Staff/educators who work directly with children will read Annex B as a minimum. The Senior Leadership team, DSL and DDSL will read KCSIE 2026 in its entirety.

- All members of staff have signed to confirm that they have read and understood the national guidance shared with them.

- As part of the induction process, all new staff, educators (including agency and temporary staff) receive Safeguarding and Child Protection training to ensure they are aware of TP Tutors' Safeguarding and Child Protection Policy and Procedure and Online Safety Policy and Procedure, that they have read and understood Part 1 and Annex A of KCSIE (Sept 2026) and that they are aware of a range of safeguarding issues including online safety.
- A record of participants ensures they receive annual training. Verification that staff have completed this will be recorded on the organisation's Single Central Record (SCR).
- TP Tutors' Safeguarding Policy and Procedure is emailed to educators when they complete registration.
- All educators will receive training which will take place at least annually.
- All staff attend Safeguarding training delivered by the Designated Safeguarding Lead at least once a year which will ensure they are aware of a range of safeguarding issues which will include online safety.
- In addition to specific training, all staff/educators will receive regular updates to provide them with relevant skills and knowledge to safeguard children and vulnerable adults effectively. Verification that staff have received and read the updates is via email.
- In-Tuition, our termly educator newsletter, will provide safeguarding updates and information.
- TP Tutors' Safeguarding Policy and Procedure can be accessed via the TP Tutors website.
- All staff members (including agency and temporary) will be made aware of the company's expectations regarding safe and professional practice via the Code of Conduct which is outlined in section 8 of this policy.
- The DSL will put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union or other similar organisations directly.
- Any member of staff affected by issues arising from concerns for children or vulnerable adults' welfare or safety can seek support from the DSL.
- The DSL will review and report to the Managing Director annually, detailing safeguarding training undertaken by all staff/educators, review and update the policy and will ensure the register of staff/educator training has been maintained and is up to date.
- TP Tutors' nominated lead for the Board of Directors, Dave Burchett, will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

7.2 Allegations/Concerns against Staff or Educators

TP Tutors will respond to allegations in line with Part Four of KCSIE 2026.
We recognise that it is possible for any member of staff, including educators, contractors, agency and third-party staff and visitors to behave in the following ways:

- Indicates they have harmed a child/vulnerable adult or may have harmed a child/vulnerable adult.
- Means they have committed a criminal offence against or related to a child or vulnerable adult.
- Behaved towards a child, children or vulnerable adult in a way that indicates he or she may pose a risk of harm to children/vulnerable adults.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable adults. Allegations of abuse can be made by children and vulnerable adults and they can be made by other concerned adults.

All staff/educators/parents/carers should feel able to raise concerns about poor or unsafe practice and potential failures in TP Tutors' safeguarding regime. The leadership team will take all concerns or allegations received seriously.

- All allegations against staff and educators must immediately be brought to the attention of the DSL who will also inform the Managing Director.
- In all cases, the Local Authority's Designated Safeguarding Officer (previously LADO) should be notified, either directly by the DSL or by the Deputy DSL confirming with the client that they have made a referral to the DSO. The DSO will agree the course of action to be taken in respect of the child/vulnerable adult and staff member.
- TP Tutors' local LADO is Hampshire County Council and all staff are aware of the contact details and how and when to make a referral: https://hipsprocedures.org.uk/home/multi-agency-safeguarding-arrangements-and-organisational-responsibilities/adults-who-pose-a-risk-of-harm
- Following advice from the DSO, the educator or staff member may be suspended or have his or her working arrangements reviewed, pending the investigation.
- If an allegation is made against the DSL/DDSL this should be brought to the attention of the Managing Director.
- If an allegation is made against the Managing Director, the DSL should bring this to the attention of a second Company Director, who will inform the DSO.
- Support and advice will be available from another senior member of TP Tutors' staff for individuals against whom allegations have been made.
- All members of staff are made aware of the company's Whistleblowing procedure contained within this policy (8.7). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child/vulnerable adult at risk.
- Staff can access the NSPCC Whistleblowing helpline if they do not feel able to raise concerns regarding safeguarding failures internally: **https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/**
- Staff can call the NSPCC helpline on **0808 800 5000** or email help@nspcc.org.uk.
- TP Tutors has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason

to believe the member of staff/educator has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at TP Tutors, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the DSO.

7.2.1 Harm Thresholds

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of TP Tutors from potential false allegations or misunderstandings.

- The DSL will seek advice regarding harm 'thresholds' from Local Designated Safety Officer.
- **Concerns that do not meet the 'harm threshold' -** TP Tutors may also need to take action in response to 'low-level' concerns about staff which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- Where low-level concerns are reported to the DSO, these will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, TP Tutors will implement appropriate action.

7.3 DBS Referral

If TP Tutors removes an individual (paid worker or unpaid volunteer) from any DBS regulated activity (or would have, had the person not left first) because the person poses a risk of harm to children or vulnerable adults, TP Tutors will make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

Suspension should be considered when:

- There is cause to suspect a child or vulnerable adult is at risk of significant harm or
- The allegation warrants investigation by the police or
- The allegation is so serious that it might be grounds for dismissal.

Any disciplinary investigation should be carried out once the investigation has been completed.

8. Code of Conduct

The code of conduct outlines the conduct TP Tutors expects from all our staff and educators. This includes members of the board of directors, educators (including temporary agency and temporary staff) and anyone who is undertaking duties for the organisation whether paid or unpaid.

- As part of our approach to safeguarding, TP Tutors has created and embedded a culture of openness, trust and transparency in which our values and expected behaviours as set out in our Code of Conduct are constantly lived, monitored and reinforced by all staff (including educators, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the company's safeguarding regime. The leadership team will take all concerns or allegations received seriously.
- The Code of Conduct aims to help us protect children and vulnerable adults from abuse and reduce the possibility of unfounded allegations being made.
- TP Tutors is responsible for making sure everyone taking part in our services has seen, understood and agreed to follow the code of conduct and understand the consequences of inappropriate behaviour.
- All staff /educators (including temporary agency or temporary staff) are expected to adhere to a code of conduct in respect of their contact with learners and their families.
- Children and vulnerable adults will be treated with respect and dignity.
- There should be no physical contact between educators and children/vulnerable adults to avoid placing educators in a position where their actions might be open to criticism or misinterpretation.
- Staff/educators should exercise caution in situations where they are alone with learners for their own safety and protection. The door to the room in which the 1:1 tuition is taking place should be left open. Where this is not practicable because of the need for confidentiality, another adult will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting.
- Staff/educators should also be alert to the possible risks that might arise from social contact with children or vulnerable adults outside of the learning environment and notify the DSL or DDSL immediately if this happens.
- Home visits or private tuition of children and vulnerable adults should only take place with the knowledge and approval TP Tutors.
- Staff/educators will only use TP Tutors' digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Managing Director. Staff will only use the approved company email, online learning platform or other company-approved communication systems with learners or parents/carers.
- Staff/educators should be aware of the organisation's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the DSL/DDSLs.
- In order to protect children, vulnerable adults, staff and educators, we encourage staff and educators to conduct themselves professionally at all times. This covers appropriate dress, the understanding and adherence to relevant boundaries, social contact outside setting (including on social

networking sites), the receiving and giving of gifts, favouritism and the safe use of technology.

Fleet staff and educators should seek to keep personal contact with children and vulnerable adults under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. Following sensible precautions and advice must be heeded when working with children and vulnerable adults.

8.1 Learner/Educator Relationship

- Never ask a child or vulnerable adult personal questions about their background.
- Remain open to any questions or concerns a learner may have about attitudes and behaviours they may not feel comfortable with.
- Act as a positive role model for every child and vulnerable adult you work with.
- Remember that others may misinterpret your actions, no matter how well intentioned.
- Refrain from any physical contact with learners and ensure that inappropriate subjects are not discussed, or inappropriate banter exchanged.
- Never promise to keep any disclosure secret – you have a duty to report disclosures or any concerns you may have to the DSL.
- Consider whether a vulnerable adult is able to provide informed consent or whether action is needed in their best interests.
- Never arrange to meet learners outside of tuition sessions or give them lifts to and from tuition in your car.
- Refrain from giving out your personal numbers or private email addresses to children and vulnerable adults.
- Never arrange to meet the learner outside of the formal tutoring arrangements.
- Never use social networking sites – or similar technological platforms – to communicate with learners.
- Do not give gifts to, or accept gifts from, children and vulnerable adults you are working with – this could be considered as a bribe or inducement to enter into a relationship and could give rise to allegations of improper conduct.
- Under the Sexual Offences Act 2003, it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.
- **DO NOT** believe it could not happen to you; it could.

8.2 De-escalation Strategies

De-escalation refers to the process of defusing conflicts as they begin to prevent them from getting worse or potentially violent. In regard to tuition, educators will use strategies to de-escalate conflicts in their earliest stages and stop small behavioural issues before they get out of hand. These usually involve identifying a risk and intervening as quickly as possible in a calm and controlled manner.

Educators will remain calm and use non-verbal communication and de-escalation strategies to defuse a situation and prevent conflicts before they have gained traction and escalate through:

- Active Listening. Acknowledge the opinion of the other person and their feelings towards the situation (e.g. I understand why that would be frustrating). Communicate openly to help them see that you are on their side. This will help you work together towards a solution instead of fighting against each other.
- Stay Calm. This will help the student feel less threatened and more likely to communicate with you. Keep your temper and model respectful behaviour towards your learner. Lower your voice and speak calmly and slowly.
- Offer Positive Choices. Instead of telling a learner what to do, or trying to force them to behave in a certain way, try giving them a few different options to choose from. This will prevent the learner from feeling powerless or unheard and help direct them towards displaying desirable behaviour.
- Ask Questions. Perhaps the learner is struggling with something you can help with or needs something in order to focus. If you ask a learner what you can do to help them focus, they may surprise you with some practical solutions.
- Choose your battles wisely. Do not engage in a lengthy debate or argument with the learner which could escalate. Let them know that you hear them, that you acknowledge their opinion.
- Keep your distance. Give the learner space and do not raise your voice. Suggest a time out immediately.
- Repair. If a situation does escalate, wait until the learner is calm and then discuss what happened in order to build and repair and avoid the situation recurring.

8.3 Restrictive interventions and use of reasonable force

One of our key principles is to prevent situations from escalating in the first place through positive relationship-building, de-escalation strategies and early intervention.

Our approach to behaviour is prevention first, intervention only when necessary and always in the child's best interests.

Risk assessments and support plans are in place for all learners whose behaviour may present safety concerns.

TPT ensures that educators receive safeguarding, prevention and de-escalation training and understand the importance of reporting all concerns. Educators receive training and guidance on:

- Building positive relationships.
- Using effective engagement strategies
- Recognising triggers and early signs of distress.
- Using calm verbal communication, distraction techniques, neutral body language, remaining regulated, providing reassurance, respecting a learner's space and having a break or timeout as required.
- Seeking support where needed.

Interventions might include:

- **Physical**: holding, guiding, blocking movement, separating pupils or restraining someone.
- **Non-physical**: restricting access to a location or using other measures that limit a learner's freedom of movement.

TPT ensures that the following training and guidance is in place to support and protect both learners and educators:

- Safeguarding policies include guidance on restrictive interventions and reasonable force.
- Educators understand when intervention may be lawful and appropriate.
- Educators receive behaviour management and de-escalation training.
- Incidents are recorded, reviewed and escalated where necessary.
- Risk assessments and support plans are in place for pupils whose behaviour may present safety concerns.

Physical intervention should only be used when necessary to prevent immediate harm and must always be the minimum reasonable response.

Educators will **never** use restrictive interventions or reasonable force in the following circumstances:

- As a punishment.
- To enforce compliance with instructions where there is no safety risk.
- For staff convenience.
- In a way that restricts breathing or circulation.

Seclusion and non-force restrictive interventions

Educators must not isolate, confine, block exits, prevent a learner from leaving an area or otherwise restrict a learner's freedom of movement unless there is an immediate safety risk and it is the least restrictive, shortest possible response. Seclusion must never be used as punishment, convenience, behaviour management or to enforce compliance. Any use of seclusion or non-force restriction must be reported and recorded in line with safeguarding and incident reporting procedures.

Educators will report all incidents to the Safeguarding team and inform the parent/carer as soon as possible after the incident. Clients will be informed of all such incidents.

A parent/carer must be present to supervise all sessions and may be called upon to support if required.

8.4 Anti-Bullying

TP Tutors promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of safeguarding responsibilities. TP Tutors is committed to providing an environment free from all forms of bullying.

TP Tutors seeks to prevent bullying through:

1. Promoting positive, respectful and inclusive relationships between learners, educators and families.
2. Setting clear expectations for behaviour and conduct at the start of every placement.
3. Risk assessing placements and identifying known vulnerabilities, safeguarding concerns or previous incidents of bullying.
4. Training educators to recognise, challenge and report bullying, discriminatory behaviour and prejudice-based incidents.
5. Maintaining an environment where learners feel safe to raise concerns and know they will be listened to.
6. Working collaboratively with schools, commissioners, parents/carers and other professionals where bullying concerns arise.
7. Implementing appropriate support plans and safeguarding measures where a learner has experienced bullying or is at risk of bullying.
8. Monitoring concerns, patterns and incidents to identify emerging risks and ensure appropriate intervention.

Where bullying is identified, TP Tutors will take appropriate action to safeguard those involved, record concerns, inform relevant stakeholders and implement measures to reduce the likelihood of recurrence.

- Bullying in any form should be reported to the appropriate line manager. This includes all forms e.g., cyber, prejudice-based, discriminatory, racist, homophobic and gender related bullying.
- Educators are aware that children with SEND and or differences/perceived differences are more susceptible to being bullied and being victims of abuse. All incidences will be reported to safeguarding and appropriate action taken.
- Educators recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination and that such experiences may affect a child's welfare, wellbeing, mental

health and willingness to seek help. Educators should be alert to the signs and impact of prejudice-based harm and ensure that a concern is raised with the safeguarding team.

8.5 Online Safety and Use of Digital Technology

TP Tutors recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2026, TP Tutors has appropriate mobile and smart technology and image use policies in place which are shared and understood by all staff, educators and parent/carers and other agencies or members of the wider community, as appropriate (incorporated within this policy and separate Online Safety policy).

TP Tutors is aware of our responsibility to use digital technology to keep children safe online, prevent cyber incidents and upgrade and maintain technology **in order to meet cyber security standards.** We are aware that abuse online can take place wholly online or technology may be used to facilitate offline abuse.

TP Tutors staff and educators are aware of the **four Cs of online risk**:

Content: being exposed to extreme sexual or physical violence, simulated harmful online AI interactions, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: making, sending or receiving self-generated intimate images using AI. Behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your learners or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

TP Tutors recognises the importance of providing age and stage appropriate guidance around understanding online harms such as sharing images, the prevalence of
deepfakes, pornography and misogynistic influencers and when and where to seek help.

We are also aware of the dangers of misinformation, disinformation (including fake news) and conspiracy theories that pose a risk to children and vulnerable adults.

The growth of different electronic media in everyday life and an ever-developing variety of devices including PCs, laptops, tablets, mobile and smart phones, webcams etc., place an additional risk on children and vulnerable adults.

Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and vulnerable adults with a view to grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.

Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children.

Learners can engage in or be a target of bullying using a range of methods including text and instant messaging to reach their target. Mobile phones are also used to capture violent assaults of other children for circulation. The best protection is to make pupils aware of the dangers through reference to the Child Exploitation and On-line Protection Centre where appropriate http://www.ceop.gov.uk/.

8.5.1 Generative AI

Generative AI is one type of AI that refers to technology that can be used to create new content based on large volumes of data that models have been trained on a variety of sources. AI is evolving at pace and advances in technology mean that we can now use these tools to produce AI-generated content. This creates opportunities and challenges for the education sector and as an education provider TP Tutors is aware of both. Challenges include content produced by generative AI that could be:

- Inaccurate
- Inappropriate or unsafe
- Biased
- Taken out of context
- Taken without permission (intellectual property infringement)
- Out of date or unreliable
- Low quality.

ChatGPT, Microsoft Copilot and Google Gemini are generative AI tools, built on large language models (LLMs). LLMs are a category of foundation models trained on large amounts of data, enabling them to understand and generate human-like content. Tools such as ChatGPT, Microsoft Copilot and Google Gemini can:

- Answer questions
- Complete written tasks
- Generate images, text or code
- Respond to prompts in a human-like way.

Other forms of generative AI can produce:

- Audio
- Simulations

- Videos.

If generative AI is used by educators in sessions, they must take great care to ensure they are abiding by their legal responsibilities, including those related to:

- Data protection
- Keeping Children Safe in Education
- Intellectual Property Law

Educators will consider the possible impact on learning, the importance of the educator-learner relationship and the risks of bias and misinformation. Educators will discuss the opportunities and challenges of AI with learners.

TP Tutors' educators will take the following approach:

- Make the most of the opportunities that technology provides
- Use technology safely and effectively to deliver excellent education that prepares learners to contribute to society and the future workplace
- Be aware of the limitations and risks of this technology
- Technology, including generative AI, should not replace the valuable relationship between teachers and pupils.

Staff and educators should refer to the TP Tutors Online Safety policy for further guidance.

Further guidance on online safety can also be found in Annex D of KCSIE 2026.

8.6 Tuition Setting and Environment

Educators should take evidence of their enhanced DBS check and photo ID (such as driving license or passport) with them on their first visit to a new learner.

Educators working in schools and other education settings may be required to allow the establishment they are visiting to retain a copy of their enhanced DBS check and photo ID for the duration of the tuition assignment. This will be recorded on the school's Single Central Record (SCR) and removed at the end of the educator assignment.
Educators will abide by the following protocols:

- Always ensure that another adult is present before entering a tuition setting. This could be a teacher, carer, parent or other adult who has responsibility for the welfare of the child/vulnerable adult. If no other adult is present, you should not enter the premises; explain to the child/vulnerable adult that you cannot come in until there is a responsible adult present. Call your Tuition Consultant at TP Tutors to inform them of the situation immediately.

- Ensure that you work in a suitable environment with the door ajar and in earshot of other adults. If you have a concern that the environment is not suitable, you should report this immediately to your Tuition Consultant at TP Tutors. If you have a concern that the environment poses a potential risk of harm to a child/vulnerable adult, or to you, you should immediately inform the DSL.
- The tuition area represents a professional working space and therefore should have a table, chair, adequate lighting and equipment. Distractions such as mobile phones, TV/radio should be switched off. No pets should be present and no smoking.
- Always dress appropriately for tuition; consider the setting you are working in and being respectful to the religious and cultural backgrounds of the people you may come into contact with during tuition.
- If using the internet or other technology for the purposes of tuition, always seek the permission of the parent or carer and ensure that all material is age-appropriate for children and vulnerable adults and relevant to the purpose of tuition.

8.7 Whistleblowing

TP Tutors fosters a culture of openness in line with the "Freedom to speak up" review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children and vulnerable adults or poor practice that may cause a risk to children and vulnerable adults.

- All staff/educators should be aware of their duty to raise concerns, where they exist, about the management of child/vulnerable adult protection, which may include the attitude or actions of colleagues. If an issue arises that they feel needs reporting, this should be to their line manager in the first instance and, if this is not appropriate, to the Managing Director.
- TP Tutors recognizes that there may be circumstances where staff and learners feel unable to raise concerns or incidents of malpractice within the organization as there is reasonable doubt that these would be dealt with adequately.
- All staff/educators have a legal duty to raise concerns where they feel individuals are failing to safeguard and promote the welfare of children and vulnerable adults. Where it is not possible to raise concerns within TP Tutors, staff/educators may report concerns to the following:

Ofsted whistle-blowing helpline: 0300 1233155

https://www.gov.uk/government/publications/whistleblowing-about-childrens-social-care-services-to-ofsted/sharing-concerns-and-information-with-ofsted-about-childrens-social-care-services

NSPCC whistleblowing helpline: 0800 028 0285

https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

The Managing Director is responsible for ensuring that these numbers are made available to staff, learners and parents.

9. Safer Recruitment

TP Tutors recognises that safer recruitment practices are an essential part of creating a safe environment for children/vulnerable adults and will ensure that office staff employed by TP Tutors and educators who have direct contact through teaching children/vulnerable adults are suitable to do so and do not pose any kind of risk. Written confirmation of our commitment to these practices is available for our clients.

TP Tutors will follow the Keeping Children Safe in Education (2026) Safer Recruitment processes in education settings (Part 3) as well as guidance from The Disclosure and Barring Service (DBS). For detailed information on how TP Tutors applies Safer Recruitment processes, please refer to TP Tutors Recruitment and Selection Policy.

TP Tutors is committed to ensuring that we develop a safe culture and that all steps are taken to recruit staff and educators who are safe to work with our learners and staff.

9.1 General principles

- The Managing Director and the leadership team are responsible for ensuring that the company follows safer recruitment processes outlined within the statutory guidance.
- All staff and educators are recruited in accordance with TP Tutors' Safer Recruitment policy and abide by Data Protection, Confidentiality and Security Policies.
- All staff responsible for recruitment have undertaken training in Safer Recruitment.
- TP Tutors will carry out extensive checks and enquiries on applicants for all positions and directorships, in accordance with statutory requirements.
- No staff members, educators or directors will be allowed to take up posts until all checks and enquiries required for that position have been satisfactorily completed.
- Checks with the Disclosure and Barring Service will be carried out at the appropriate level of the candidate's role in the organisation.
- All job advertisements and applications will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.

- The company maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Managing Director will ensure that at least one member of staff who conducts interviews has completed safer recruitment training.
- We advise all staff to disclose any reason that may affect their suitability to work with children/vulnerable adults including convictions, cautions, court orders, reprimands and warnings.
- We will ensure that all staff and educators have read the staff Code of Conduct and understand that their behaviour and practice must be in line with it.
- Newly appointed staff will have initial training in Safeguarding as part of their induction programme and receive a copy of the TP Tutors Safeguarding and Child Protection Policy and Procedure.
- Newly recruited educators will be given a copy of TP Tutors' Safeguarding and Child Protection Policy and Procedure.

9.2 Checks to be carried out

TP Tutors verifies the following information for all new staff:

- The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided.
- The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted and its validity checked.
- Where the applicant will be involved in regulated activity, an enhanced DBS check will be taken out, including information from the barred list. Teaching staff cannot begin work until their enhanced DBS check has been completed.
- In the case of educators, checks will be made on the applicant's academic and vocational qualifications and further checks made on TRA Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order.
- Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach via the TRA Teacher Services system.
- Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role.
- Online search checks may be made into an applicant to check for suitability in the role and documentation will be held with the applicant's vetting information for audit purposes. Anything of concern found within these searches will be shared with the DSL for further investigation.
- TP Tutors will keep copies of the following documents on staff personnel files:

- Documents used as proof of identity such as passports or driving licences.
- A summary of the DBS certificate (but all other documents relating to the DBS check must be destroyed).
- Documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).
- Online search results.

9.3 References

- Applicants will be asked to provide a full employment history and details of at least 2 referees, including previous and recent employers, who should be a senior member of staff with the authority to provide references.
- All references will be taken up post interview and will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided.
- References will be taken up from current employers; if the applicant is not currently employed, verification will be sought from their last employer. If they have worked in any form of education/childcare before, referees will be contacted from their last school/college as to the dates the applicant was employed and the reasons for leaving the post.
- Information provided by applicants as part of an application process will be verified with independent sources, and any reference received electronically will be checked to verify the originating source.

9.4 DBS checks

In order to ensure that people who work with children and vulnerable adults are suitable to do so and are not barred from working with children, TP Tutors will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

Full Enhanced DBS checks, which include the Children's barred list, will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- Teaching
- Training
- Supervising
- Guidance and advice.

- The activity must be carried out regularly as part of the staff member's day to day responsibilities and the checks will be reasonable in order to safeguard children and vulnerable adults.
- Full DBS checks with barred list checks will also be carried out on all staff /educators whose work means they have an opportunity for regular contact with children or vulnerable adults.
- TP Tutors has robust procedures for day-to-day staff management and supervision and clear procedures for reporting and acting on concerns. Staff

carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

- TP Tutors will ensure that all DBS checks carried out on staff are on the update service or renewed after 3 years of the original DBS disclosure.
- For staff and educators registered with the DBS Update Service, an update check will be performed every year. Where an update check reveals a change of information, a new enhanced DBS check will be required.
- Where an educator does not subscribe to the update service, not only should a DBS be carried out prior to employment (as with other personnel and educators) but this would need to be carried out every year or before if:
    - There is a break in service of 12 weeks or more
    - There are concerns raised about an individual's suitability to work with children.

10. Policy Compliance, Monitoring and Evaluation

- TP Tutors will review this policy at least annually and will update it as needed so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.
- The policy will be revised following any national or local policy updates, any significant local safeguarding concerns and/or any changes to our procedures.
- All staff (including educators and temporary staff) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2026, as appropriate. It will also be included on the TP Tutors website.
- Parents/carers will be provided with the TP Tutors' Safeguarding Policy Statement and advised that the full policy is available on our website (www.fleeteducationservices.com) or on request.
- The Designated Safeguarding Lead and Managing Director will ensure regular reporting on safeguarding activity and systems to the board of directors but they will not receive details of individual learners or identifying features of families as part of their oversight responsibility.

11. Record Keeping

All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing using TP Tutors' Safeguarding MyCommunity Report Form and passed without delay to the Safeguarding team. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.

- Records will be completed as soon as possible after the incident/event, using the child's/vulnerable adult's words and will be signed and dated by the member of staff/educator. The MyCommunity Form will record facts and not personal opinions. A body map will be completed if injuries have been observed.

- If there is an immediate concern, the member of staff should consult with the DSL/DDSL before completing the form as reporting urgent concerns takes priority.
- Safeguarding records are kept for individual children/vulnerable adults and are maintained separately from all other records relating to the child/vulnerable adult in the company's MyConcern platform (only accessible to DSL/DDSLs).
- Child/vulnerable adult protection records will be kept confidential and stored securely in accordance with data protection legislation and are retained centrally and securely.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's/vulnerable adult's subsequent school/college on request, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- In addition to the safeguarding file, the DSL will also consider if it would be appropriate to share any information with the DSL at the educational establishment that the child or vulnerable adult is attending.
- Where TP Tutors receives child protection files, the DSL will ensure key staff are made aware of relevant information as required.

12. Multi-Agency Working

TP Tutors recognises and is committed to its responsibility to work within local authority multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.

The company recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a co-ordinated response to promote children's/vulnerable adults' welfare and protect them from harm. This may include participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Child in Need meetings or other multi-agency meetings.

13. Safeguarding Children with Special Educational Needs and Disabilities

TP Tutors acknowledges the additional vulnerabilities of children or vulnerable adults with special educational needs (SEND) or with certain health conditions who may not understand what is happening to them is abuse as they may have impaired capacity to resist, recognise or avoid abuse or neglect. They may receive intimate care or they may be isolated from others.

Children's medical conditions are not in themselves indicators of being at safeguarding risk but all staff and educators should be aware of the potential risk and raise a concern to the DSL if required.

- We recognise that children or vulnerable adults with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children or vulnerable adults with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- The DSL will work closely with other agencies and SENCos to plan support as required.
- Members of staff/educators will be encouraged to be aware that children or vulnerable adults with SEND can be disproportionally impacted by safeguarding concerns, such as bullying and exploitation, peer group isolation or bullying including prejudice-based bullying.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's/vulnerable adult's disability and be aware that children or vulnerable adults with SEND may not always outwardly display indicators of abuse. They will be mindful that children with SEND or certain medical conditions may be disproportionally impacted by behaviours such as bullying without outwardly showing any signs.

14. Safeguarding Vulnerable Groups

TP Tutors is aware that some learners may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, CSSW or other agencies in order to overcome problems or keep them safe.

14.1 Children or vulnerable adults who have a social worker

TP Tutors recognises that children or vulnerable adults who are receiving a social work service from CSSW and who are subject to Child in Need or Child Protection plans are likely to have experienced abuse, neglect and trauma and that this could have a negative effect on their behaviour and learning.

TP Tutors will work in partnership with social workers to implement the relevant plan in order to support their education, and safeguard and promote their welfare. A representative of TP Tutors who knows the young person well, will become part of the professional network and will share information about safeguarding risks and attend planning meetings. In their absence, a suitable colleague will deputise for the member of staff, or a written report will be provided for meetings.

14.2 Looked after children (LAC)

TP Tutors recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- The DSL will undertake Children in the Care of Others awareness training.

15. Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Staff/educators will be expected to adhere to any on-going safety arrangements. Whilst there is currently no Government guidance in relation to Covid 19, in the event of any change TP Tutors staff and educators will comply with guidance provided. We ask all parties to inform each other if they exhibit symptoms or test positive for coronavirus. Attempts will be made to avoid disruption to learners' education by providing an alternative mode of delivery if appropriate.

TP Tutors will not accept the behaviour of any individual (parent or other) that threatens TP Tutors' security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the company's services.

Policy Approved by: Dave Burchett
Managing Director

Date: 7th August 2026

16. Version Control

Version	Date	Author	Summary of Changes	Approved By	Next Review Date
2.0	September 2026	Head of Education Quality Assurance	Updated due to new policy format.	Managing Director	September 2027
2.1	October 2026	Head of Education Quality Assurance	Updated section 3.2 to clarify the reporting, recording and escalation of safeguarding concerns with commissioners, schools and referring organisations. Updated section 8.4 to strengthen the prevention, reporting and response arrangements for bullying and discriminatory behaviour.	Head of Compliance	September 2027

Appendix 1 Recognising Signs of Abuse, Neglect and Exploitation

All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children (2026) https://Working_together_to_safeguard_children_2026.pdf
and Keeping Children Safe in Education 2026.

TP Tutors recognises that when assessing whether a child or vulnerable adult may be suffering actual or potential significant harm there are four categories of abuse: **Physical, Sexual, Emotiona**l abuse and **Neglect.** If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputy).

All members of staff are aware of and are expected to use the following approach if they are concerned about a child or vulnerable adult. In all cases staff should seek advice from the DSL if unsure.

1 Be alert
2 Question Behaviours
3 Ask for Help
4 Refer.

A1.1 Abuse, Neglect and Exploitation

By understanding the indicators of abuse, neglect and exploitation, we can respond to concerns as early as possible and provide the right support and services for the child and their family.

- All staff/educators should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children or vulnerable adults who may be in need of help or protection.
- All staff/educators should be aware children may also cause harm to other family members, often referred to as child to parent or care giver abuse.
- All staff/educators should be aware that the indicators for emotional abuse include verbal abuse such as persistent criticism, belittling or name calling.
- All staff/educators should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- All staff/educators should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children or vulnerable adults outside of these environments.
- All staff/educators, but especially the Designated Safeguarding Lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children or vulnerable adults can be vulnerable

to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse and serious youth violence and county lines.

- All staff/educators should recognise that racism, faith-targeted abuse and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety.
- Children or vulnerable adults may report abuse happening to themselves, other children or vulnerable adults or their family members. All reports made to staff/educators will be taken seriously and will be responded to in line with this policy.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children and vulnerable adults are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children and vulnerable adults can also abuse other children or vulnerable adults online.
- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children and vulnerable adults of all forms of domestic abuse.

A1.2 Signs of Abuse in Children and Vulnerable Adults

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour.
- Appear to be frightened of the parent/carer.
- Extreme anger or sadness.
- Aggressive and attention-seeking behaviour.
- Suspicious bruises with unsatisfactory explanations.
- Lack of self-esteem.
- Self-injury.
- Depression.

A1.3 Risk Indicators:

The factors described in this section are frequently found in cases of abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with the designated/named/lead person, manager, (or in the absence of all those individuals, an experienced colleague).
- The child may act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

A1.4 Recognising Physical Abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or vulnerable adult. Physical harm may also be caused when a parent

or carer fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.

Signs that MAY INDICATE physical abuse:

- Bruises and abrasions around the face.
  • Damage or injury around the mouth.
  • Bi-lateral injuries such as two bruised eyes.
  • Bruising to soft area of the face such as the cheeks.
  • Fingertip bruising to the front or back of torso.
  • Bite marks.
  • Burns or scalds (unusual patterns and spread of injuries).
  • Deep contact burns such as cigarette burns.
  • Injuries suggesting beatings (strap marks, welts).
  • Covering arms and legs even when hot.
  • Aggressive behaviour or severe temper outbursts.
  • Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

A1.5 Recognising Emotional/Psychological Abuse

Emotional abuse may be difficult to recognise as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

• Persistent emotional maltreatment such as to cause severe and adverse effects on the child or vulnerable adult's emotional development.
• It may involve conveying to a child or vulnerable adult that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.
• It may include not giving the child or vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
• It may feature age or developmentally inappropriate expectations being imposed on children or vulnerable adults. These may include interactions that are beyond a learner's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child or vulnerable adult from participating in normal social interaction.
• It may involve seeing or hearing the ill-treatment of another.
• It may involve serious bullying (including cyberbullying), causing children or vulnerable adults frequently to feel frightened or in danger or the exploitation or corruption of children.
• Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, although it may occur alone.

Signs that MAY INDICATE emotional abuse:

- Over reaction to mistakes.
- Lack of self-confidence/esteem.
- Sudden speech disorders.
- Self-harming.
- Eating Disorders.
- Extremes of passivity and/or aggression.
- Compulsive stealing.
- Drug, alcohol, solvent abuse.
- Fear of parent/carer being contacted.
- Unwillingness or inability to play.
- Excessive need for approval, attention and affection.

A1.6 Recognising Sexual Abuse

Sexual abuse involves forcing, causing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving violence, whether or not the child/vulnerable adult is aware of what is happening.

- The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside or over clothing.
- They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or vulnerable adults to behave in sexually inappropriate ways or grooming a child in preparation for abuse.
- Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children.
- The sexual abuse of children by other children is a specific safeguarding issue in education and all staff and educators should be aware of it and of Fleet Educations Services' policy and procedures for dealing with it.
- Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not.
- TP Tutors recognises that there are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Signs that MAY INDICATE Sexual Abuse:

- Sudden changes in behaviour and education performance.
- Displays of affection which are sexual and age inappropriate.
- Self-harm, self-mutilation or attempts at suicide.
- Alluding to secrets which they cannot reveal.
- Tendency to cling or need constant reassurance.
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby.

- Distrust of familiar adults e.g., anxiety at being left with relatives, a childminder or lodger.
- Unexplained gifts or money.
- Depression and withdrawal.
- Fear of undressing for PE.
- Sexually transmitted disease.
- Fire setting.

https://shorespace.org.uk/ 'Shore' is a resource for teenagers who are worried about sexual behaviour. It has a library of articles and a helpline from 5-8pm and is run by a charity working (particularly with people who may offend) to prevent all forms of child sexual abuse.

A1.7 Recognising Neglect

Neglect is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

- Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.
- Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child or vulnerable adult from physical and emotional harm or danger.
- The failure to provide adequate supervision (including the use of inadequate caregivers).
- The failure to provide access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child or vulnerable adult's basic emotional needs.

Signs that MAY INDICATE Neglect:

- Constant hunger.
- Poor personal hygiene.
- Constant tiredness.
- Inadequate clothing.
- Frequent lateness or non-attendance.
- Untreated medical problems.
- Poor relationship with other children.
- Compulsive stealing and scavenging.
- Rocking, hair twisting and thumb sucking.
- Running away.
- Loss of weight or being constantly underweight.
- Low self-esteem.

Appendix 2 Specific Types of Abuse

A2.1 Mental Health

- Staff/educators are aware that mental health problems can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.
- Where children or vulnerable adults have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these experiences can impact on their mental health, behaviour and education. Staff/educators are well placed to observe learners 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.
- If staff have a mental health concern about a child or vulnerable adult that is also a safeguarding concern, this will immediately be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.
- Staff/educators are aware that children and vulnerable adults are not necessarily in a position to provide informed consent regarding the use of their information or for the management of matters related to safeguarding. In most cases, this must be referred to professionals (such as social workers) and parent/carers unless it is believed the child or vulnerable adult will be placed at increased risk OR if it is in the public interest in order to prevent a crime or protect others from crime.

A2.2 Child Criminal Exploitation (CCE)

TP Tutors recognises that CCE is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CCE can affect both male and female children and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket or to threaten other young people.

Signs that MAY indicate CCE:

- Unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Changes in emotional well-being.
- Misuse of drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly absent from school or education or not taking part in education.

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL.

A2.3 CSE Child Sexual Exploitation (CSE)

TP Tutors recognises that CSE is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE can affect both male and female children and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The victim may have been criminally exploited even if the activity appears consensual.

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online.

Some signs that MAY indicate CSE:

- Going missing for periods of time or regularly coming home late.
- Regularly absent from school or education or not taking part in education.
- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse and displaying inappropriate sexualised behaviour.

A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17-year-old if that person holds a position of trust or authority in relation to the young person.

Non-consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

A2.4 Nude and/or Semi-nude Image Sharing by Children / 'Sexting'

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of all visual content, nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

TP Tutors recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

The UK Council for Child Internet Safety (UKCIS) advice for education settings on the sharing of nudes and semi-nudes outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working will all age groups, not just older learners.

Appendix 3 provides specific procedures for reporting any concerns.

A2.5 Serious Violence/Gangs

All staff will be made aware of indicators which may signal that children or vulnerable adults are at risk from, or are involved with, serious violent crime or individuals associated with criminal networks or gangs.

These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing or signs of assault or unexplained injuries, unexplained gifts or new possessions.
We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon as it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns.

All staff/educators will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents *Advice to schools and colleges on gangs and youth violence* and *Criminal exploitation of children and vulnerable adults: county lines*.

A2.6 Knife Crime

Knife crime is a term used commonly to refer, primarily, to street-based knife assaults and knife carrying. However, there are many criminal offences relating to knives:

- It is an offence to threaten or cause harm to a person with a bladed weapon.
- Some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18.
- Offences such as robbery or assault can be aggravated if a knife is involved.
- It is also an offence to carry a knife in a public place without good reason.

The highest level of risk is for those children who have been groomed into gangs for the purposes of criminal exploitation.

Also at risk are children who have witnessed other children carrying knives, have been the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on social media.

All staff and educators at TP Tutors recognise that knife crime has a huge impact on children and the communities in which they live nationally, and that it is an increasing safeguarding risk to children both at school and in their local communities.

Any concerns regarding knife crime or serious violence will be reported and responded to in line with other child or vulnerable adult protection concerns.

The initial response to child or vulnerable adult victims is important and staff will take any allegations seriously and work in ways that support children and vulnerable adults and keep them safe.

A2.7 County Lines

Criminal exploitation of children and vulnerable adults 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 vulnerable adults to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Some signs that MAY indicate a child is involved in County Lines:

- Key to identifying potential involvement in county lines are episodes of absence, when the victim may have been trafficked for the purpose of transporting drugs.
- Like other forms of abuse and exploitation, county lines exploitation can affect any child or young person (male or female) under the age of 18 years.
- It can still be exploitation even if the activity appears consensual.
- It can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- It can be perpetrated by individuals or groups, males or females, and young people or adults.

- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

A2.8 Child-on-child Abuse

All staff and educators at TP Tutors recognise that children are capable of abusing other children and that it can happen both inside and outside of school as well as online.

Educators should see child-on-child abuse as a risk to both victim and alleged perpetrator, and
recognise it is preventable with an appropriate response that provides timely, evidenced-based support, preventing children from going on to commit abuse or violence.

Although child-on-child abuse is more likely from boys to girls, this is not always the case. Educators recognise that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator.

Child-on-child abuse is most likely to include, but may not be limited to, discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents.

TP Tutors recognises that child-on-child abuse can take different forms, including but not limited to:

- Harmful sexual behaviour (HSB) applies to behaviour occurring online, face-to-face or
  both. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years, or if one is pre-pubescent and the other is not. A younger child may also abuse an older child.
- Harassment and violence, particularly serious physical assault and harm, and the threat of harm with a weapon.
- Misogyny.
- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who are and steps must be taken to prevent this.
- Children who are questioning their gender and should be considered separately to those children who are LGBTQ+.
- Abuse of a child who questions their gender. Educators will be patient and sensitive in their discussions with a child and contact the DSL for support as required.

- Teenage relationship abuse which has a particular focus around physical, sexual, emotional abuse and stalking
- Abuse in intimate personal relationships between children.
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- Sexual violence and sexual harassment.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party.
- Upskirting (which is a criminal offence) which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals.

TP Tutors believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

TP Tutors recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place.

All staff have a role to play in challenging inappropriate behaviours between children and recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, i.e., for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

TP Tutors wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated and dealt with in line with associated policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Alleged victims, perpetrators and any other child affected by child-on-child abuse will be supported. All reports will be taken seriously and victim blaming will be avoided. TP Tutors will work with parents/carers by signposting them to appropriate sources of help and where necessary by informing the police.

A2.9 Sexual Violence and Sexual Harassment Between Children

When responding to concerns relating to child-on-child sexual violence or harassment, TP Tutors will follow the guidance outlined in Part Five of KCSIE 2026

and the DfE 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges' guidance.

TP Tutors recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed or humiliated or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitates communication.

Procedure:

- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis. The DSL will seek further advice from Children's Services and/or the Police to explore next steps and how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). The risk and needs assessment will be recorded and kept under review.
- Reports will initially be managed internally and where necessary will be referred to Children's Services and/or the Police.
- The decision-making and required action taken will vary on a case-by-case basis but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult learners or staff, and any other related issues or wider context.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Children's Services or the Police.

A2.10 Incel Ideology

Incel is a shortened version of the term 'involuntary celibate'. The incel subculture has evolved from a little-known online community into a recognised source of

extremist misogyny, hostility and blame towards society and, in some cases, violence. In recent years, the subculture has gained much wider prominence on the security and news agenda and has been linked to several high profile terrorist attacks.

Incel ideology promotes the world view that women are not only genetically inferior to men but are solely driven by an inherent sexual desire to mate with males who they see as genetically superior to them. This leads to the view that those males in the bottom tier (the incels) will automatically be rejected by any woman.

Incel communities primarily operate online with an growth seen in increasing forum activity and wider social media influence. Content on the sites is virulently misogynistic with prevalent references to rape.

Incel is recognised as extremist ideology and there are four areas within safeguarding where responding to incel ideology can be identified and addressed:

- Prevent training - the Prevent Strategy has the stated aim of preventing people being drawn into terrorism which now covers incel groups.
- Domestic abuse - a number of the incel ideology views can be seen in incidents of domestic violence, e.g., association with male privilege and viewing females as property or lesser beings.
- Child-on-Child abuse - arguably both victims and perpetrators of child-on-child abuse could be demonstrating potential to identify with the incel ideology, either through the isolation and ostricisation that could come with being a victim of child-on-child abuse or through the ideology having associations with current views that perpetrators may have.
- Sexual violence and sexual harassment - those who are following the incel ideology have very set and misogynistic views in relation to women and their role in society. For some this may play out in inappropriate sexual behaviour.

If TP Tutors staff/educators have any concerns that a young person is exhibiting incel ideology views, has been a victim of incel ideology or become aware of an incident, they will share it immediately with the DSL with a view to sharing with appropriate agencies.

A2.11 Domestic Abuse

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff/educators have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

Fleet Education staff are aware of Operation Compass, a national initiative that helps safeguard children and young people who may have been exposed to domestic abuse. The Police have been given a legal duty to notify a child's educational setting and the local authority where they have reason to suspect a child may be a victim of domestic abuse.

A2.12 Honour or Faith-based Abuse (HBA) Violence Against Women and Girls (VAWG)

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff/educators have a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

VAWG is defined as any act of gender–based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life.

VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence; abuse; exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution.

If members of staff/educators have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

A2.13 Female Genital Mutilation (FGM)

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth causing danger to the child and mother; and/or death.

What do staff and educators need to know:

- FGM is a deeply embedded social norm, practiced by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman and to be marriageable. The practice is not required by any religion.
- FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.
- FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.
- FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM

A new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions, to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England.

The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e., those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence and they should not be examining pupils or learners. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out).

Further information on this duty can be found in the document "*Mandatory Reporting of Female Genital Mutilation – procedural information*". A useful summary of the FGM mandatory reporting duty is available in *FGM Fact Sheet*.

Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers. Educators will personally report to the police cases where they discover that an act of FGM appears to have been carried out. They will still discuss any such case with DSL with a view to involving appropriate agencies.

A2.14 Forced Marriage

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 and 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.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's *statutory guidance* and especially Chapter 7 on page 32 of the *Multi-agency guidelines*, which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

A2.15 Child Trafficking and Modern Slavery

Child trafficking and modern slavery are abuse. Many children, young people and vulnerable adults are trafficked into the UK from other countries like Vietnam, Albania and Romania. Children and vulnerable adults are also trafficked around the UK.

Staff and educators should also be aware of the risk of financial exploitation in connection with modern slavery.

Organised networks in CCE and CSE may move children for the purpose of exploitation which may constitute modern slavery, leading to both modern slavery and child protection referrals.

Further information can be found on the NSPCC website
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/childtrafficking/

All concerns will be reported via the My Concern link.

A2.16 Preventing Radicalisation - The PREVENT Duty

Extremism is defined as the promotion or advancement of an ideology based on hatred, violence or intolerance, that aims to:

1. Negate or destroy the fundamental rights of others, or
2. Undermine, overturn or replace the UK's system of liberal parliamentary democratic rights, or
3. Intentionally create a permissive environment for others to achieve the results in 1. and 2.

TP Tutors is aware of our duty under Section 26 of the Counter-Terrorism and Security Act 2015 that places a duty on specified authorities, including local authorities and childcare, education and other children's services providers in the exercise of their functions ("the Prevent duty") and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training and IT policies.

Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media.

Indicators that might suggest that an individual is engaged with an extremist group, cause or ideology, and might be vulnerable include:

- Spending increasing time in the company of other suspected extremists.
- Changing their style of dress or personal appearance to accord with the group.
- Day-to-day behaviour becomes increasingly centred around an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups).
- Attempts to recruit others to the group/cause/ideology.
- Communications with others that suggest identification with a group/cause/ideology.

Examples of indicators that an individual has an intention to use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills.
- Using insulting or derogatory names or labels for another group.
- Speaking about the imminence of harm from the other group and the importance of action now.
- Expressing attitudes that justify offending on behalf of the group, cause or ideology.
- Condoning or supporting violence or harm towards others.
- Plotting or conspiring with others.

Examples of indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include:

- Having a history of violence.
- Being criminally versatile and using criminal networks to support extremist goals.
- Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction).
- Having technical expertise that can be deployed (e.g., IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

Protecting children from the risk of radicalisation is just an additional part of our wider safeguarding duties and is similar in nature to protecting children from any other harms e.g., drugs, gangs, neglect, sexual exploitation, whether these come from within the family or are the product of outside influences.

The Prevent duty covers all forms of radicalisation and extremist views and is **NOT** solely limited to ISIL but includes all organisations who may seek to influence a child or young person e.g.: Paramilitary organisations, e.g., IRA, UDF, and radical organisations promoting extremist views such as far right-wing activists, animal rights activists, eco-terrorists.

It is important to emphasise that the Prevent duty is not intended to stop children and young people debating controversial issues if that is part of the curriculum delivery or arises naturally as part of the tuition programme. On the contrary, tuition which touches on such subjects e.g., English literature, history, politics, ethics etc., should provide a safe place in which children and young people can learn and understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist views and arguments under the guidance of a professional educator.

TP Tutors recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff/educators will report any concerns to the DSL.

A2.17 Channel

A voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to the local Multi Agency Safeguarding Hub (*MASH*). The MASH will share the referral details with the Prevent lead police officer and LA Prevent co-ordinator on receipt. The referral will then be processed through the MASH multi-agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

A2.18 Cybercrime

TP Tutors recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff/educators are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed and consideration will be given to accessing local support and/or referring to the Cyber Choices programme, which aims to intervene when 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.

Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

A2.19 Children who are Absent from Education, Home or Care

Children who are absent from education, home or care, particularly persistently and for unexplained reasons, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation.

If there are any concerns that a child is absent from education, home or care, staff/educators will report to the DSL/DDSL who must follow up with outside agencies and children's services where absence indicates safeguarding concerns.

A2.20 Institutional / Organisational Abuse

Institutional abuse is when an institution – e.g. company, agency, charity or organisation – makes it unnecessarily and purposefully difficult for a person to access services they need.

It refers primarily to institutions that care for children/vulnerable adults and can mean that the routines or systems in place mean that care is sub-standard or there are poor practices and behaviours from the staff. It can also be that the institution deprives the child/vulnerable adult of their rights and their dignity which violates their well-being.

This type of abuse can often be identified when a person who is cared for by an institution lacks personal belongings and doesn't have a care plan. If they regularly get admitted to hospital or are treated badly by staff, this is also institutional abuse and concerns should be reported.

Staff/educators will report any concerns about institutional abuse to the DSL/DDSL who will follow up with outside agencies in line with our policy.

A2.21 Financial or Material Abuse

Financial abuse is when a person has their access to money controlled. It can cover how a person is able to obtain money or how they get and use the money that they already have.
Financial abuse can be:

- Forcing someone to work for money that is already theirs.
- Restricting or removing access to someone's government benefits.
- Demanding that a will or inheritance arrangement are changed to include the abuser.
- Accessing benefits on behalf of the vulnerable adult.

It is possible that a vulnerable person may need help and support with their finances. Having someone help them manage their bank accounts or benefits claims in itself isn't abuse. However, the person using their position to their advantage is.

An abuser might only allow the person to use their bank card when they're present or claim the person is less capable than they are to increase government benefits. Living with a person rent-free without informed consent from the vulnerable adult is another subtle type of financial abuse.

Other indicators that someone is suffering from financial abuse might include a person who lacks money even though they have an income, having problems paying their bills, loss of confidence in their ability to look after their finances or being unusually protective of their purse, wallet or belongings.

Staff/educators will report any concerns about financial or material abuse to the DSL/DDSL who will follow up with outside agencies in line with our policy.

A2.22 Discriminatory Abuse

Discriminatory abuse means a person is being denied the right treatment on the basis of protected characteristics. Protected characteristics under UK law are:

- Gender
- Sex
- Race
- Age
- Disability
- Religion or belief
- Sexual orientation
- Gender reassignment
- Marital or civil partnership status.

If a person is not being given the care or access to services based on any of these characteristics, they may be a victim of discriminatory abuse. Whenever a child or vulnerable adult comes into contact with services, these issues need to form part of assessments and care plans.

Examples of abuse due to discrimination can include not offering a care plan in Braille to a blind person, forcing a person to attend meetings when their religion expects them to be praying or showing a movie that depicts harassment of a homosexual character.

A victim of this abuse may seem withdrawn and not keen on engaging with the services in place for them. Abuse may also be identified by looking at a care plan and understanding how it is not suitable for that person.

Staff/educators will report any concerns about discriminatory abuse to the DSL/DDSL who will follow up with outside agencies in line with our policy.

Appendix 3 Safeguarding and Child/Vulnerable Adult Protection Procedures

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances a DSL is not available, this should not delay appropriate action being taken. Staff/educator should speak to the Managing Director. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.

You may have a concern about a child/vulnerable adult's well-being based on:

- Something the child or vulnerable adult has told you.
- Something that you have noticed about the child or vulnerable adult's behaviour, health or appearance.
- Something another professional or adult (e.g., parent or carer) said or did.
- Something written or drawn as part of the learners' work.

Even if you think your concern is minor, the DSL or local authority may have more information that, together with what you know, represents a more serious worry about the child or vulnerable adult.

It is never your decision alone as to how to respond to concerns – but it is **always** your responsibility to share concerns, no matter how small.

A3.1 Responding to a Concern

(what you must do when you suspect a child/vulnerable adult may be at risk)

Let the child or vulnerable adult know what you plan to do next

If staff/educators are made aware of a child/vulnerable adult protection concern, they are expected to follow this procedure.

- **Do not** promise to keep what you have been told a secret. Concerns will have to be shared with the DSL or another agency.
- Listen carefully to the disclosure and be non-judgmental.
- Only use open questions to clarify information where necessary, e.g., who, what, where, when or Tell, Explain, Describe (TED).
- Be clear about boundaries and how the report will be progressed.
- Record the concern in line with TP Tutors' procedure using the MyCommunity Report form. If the concern is urgent and requires immediate attention, call the DSL or DDSL.
- In all cases, inform the DSL (or deputy) as soon as practicably possible.

Examples: You could say:

- I am worried about your bruise and I need to tell somebody else who can help us think about how to keep you safe.

- I am worried about you. I think it's best if I talk with my TP Tutors manager who will be able to help us decide what's for the best.
- If someone is hurting you or you are going to hurt someone else, then it's important that I share this with my TP Tutors manager who can help make a good choice about what to do.

Inform TP Tutors' DSL or DDSL immediately.
If neither is available, you should ask to speak to the Managing Director at TP Tutors.

Educators working on school premises must follow the school's safeguarding policy, and in the first instance notify the school's DSL.

Make a written record
Complete the MyCommunity report form as soon as possible after the event noting:

- Name of child or vulnerable adult.
- Date, time and place.
- Who else was present.
- What was said/what happened/what you noticed. Include in your record speech, behaviour, mood, drawings, games or appearance.
- If the child/vulnerable adult spoke, record their words rather than your interpretation.
- Analysis of what you observed and why it is a cause for concern.
- The written record must be factual not your opinion.
- If you have any concerns or are unsure about any part of this, please telephone your DSL/DDSL for guidance.
- You **must not** discuss or share this with anyone else.

A3.2 Action to be taken by DSL

The DSL shares information with other relevant professionals, including the local authority children's services department and/or the DSO formerly LADO, recording their reasons for sharing information and ensuring that they are aware of what action the other professional will take as a result of information shared. The DSL must:

- Create a child/vulnerable adult protection log for each individual case and ensure this is stored securely away from other records held on the child or vulnerable adult and updated regularly with any relevant progress.
- Provide to the relevant authority any report or record of disclosure provided by the educator or member of staff.
- Work closely and collaboratively with all professionals involved in the investigation to keep the child/vulnerable adult safe.
- Attend a child protection conference when invited and provide updated information about the child/vulnerable adult/staff member or educator.
- Inform a educator or staff member when their presence is required at a child/vulnerable adult protection conference.
- Attend any subsequent child/vulnerable adult protection review conferences.
- Ensure the Managing Director is briefed throughout any child/vulnerable adult protection investigation.

- Only share information with other Senior Managers when there is a clear need for them to be informed and with consideration of confidentiality for the child or vulnerable adult involved.

A3.3 Reporting the Sharing of Nudes and Semi-nude Imagery

Report immediately to the DSL or deputy as outlined in the policy:

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child/vulnerable adult to share or download – **this is illegal**.
- If you have accidentally already viewed the imagery (e.g., if a young person/vulnerable adult has showed it to you before you could ask them not to), report this to the DSL or deputy and seek support.
- **Do not** delete the imagery or ask the young person/vulnerable adult to delete it.
- **Do not** ask the child/children or vulnerable adult(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- **Do not** share information about the incident with other members of staff, the young person(s)/vulnerable adult it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people/vulnerable adults involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or deputy.

A3.4 Action to be taken by DSL regarding the sharing of Nudes and Semi-nude Imagery

DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child/vulnerable adult involved. This may mean speaking with relevant staff and the child/vulnerable adult involved as appropriate.
- Parents and carers will be informed at an early stage and be involved in the process to best support the child/vulnerable adults unless there is good reason to believe that involving them would put a child/vulnerable adult at risk of harm.
- All decisions and actions taken will be recorded in line with our safeguarding procedures.
- A referral will be made to the Integrated Care System (ICS) and/or the police immediately if:
    - The incident involves an adult (over 18).

- There is reason to believe that a child has been coerced, blackmailed or groomed or there are concerns about their capacity to consent, for example, age of the child/vulnerable adult or they have special educational needs.
- The image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage or are violent.
- A child/vulnerable adult is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date. If they are unsure how to proceed, advice will be sought from the ICS or the police.

A3.5 Disclosure

It is important that all staff and educators are aware of the following points when a disclosure is made to them by a child/vulnerable adult or about a child/vulnerable adult either from another child/vulnerable adult or another adult:

- Never guarantee absolute confidentiality as child/vulnerable adult protection will always have precedence over any other issues.
- Listen to the child/vulnerable adult rather than questioning them directly.
- Offer the child/vulnerable adult reassurance without making promises and take what they say seriously.
- Allow the child/vulnerable adult to speak without interruption.
- Accept what is said – it is not your role to investigate or ask probing questions.
- Do not overreact – remain calm no matter what the child/vulnerable adult is disclosing to you.
- Alleviate feelings of guilt and isolation while passing no judgement.
- Advise that you will try to offer support but that you must pass the information on.
- Explain what you have to do and whom you have to tell.
- Record the discussion accurately as soon as possible after the event.
- Use the child/vulnerable adult's words or explanations – do not translate into your own words in case you have misconstrued what the child/vulnerable adult was trying to say.
- Contact TP Tutors' DSL for advice and guidance.

REFER do not INVESTIGATE

Useful Resources and Websites

Practitioners who work with children and vulnerable adults may find the following resources useful:

- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2026)
- Safeguarding Vulnerable Groups Act (2006)
- Children Act 1989;
- https://www.gov.uk/government/publications/every-child-matters
- Childcare Act 2006 - https://www.legislation.gov.uk/ukpga/2006/21
- Counter-Terrorism and Security Act 2015 - https://www.legislation.gov.uk/ukpga/2015/6/contents
- The Children and Social Work Act 2017 https://www.legislation.gov.uk/ukpga/2017/16/contents
- Children Act 2004;
- Education Act 2011
- Mental Capacity Act Code of Practice - https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice
- Department for Education: https://www.gov.uk/government/organisations/department-for-education
- NSPCC: http://www.nspcc.org.uk/
- CEOP (Online Safety) http://ceop.police.uk/
- Safe Networks (NSPCC): http://www.safenetwork.org.uk/Pages/default.aspx

Appendix 4 - Designated Safeguarding Lead

A4.1 List of Duties

- Drawing up and enforcing the company's safeguarding policy.
- Being alert to and recognising welfare issues, being sure to challenge poor practice.
- Sharing appropriate information with relevant people.
- Gathering any other relevant information and evidence.
- Consulting local safeguarding children board procedures for additional information and guidance if needed.
- Making referrals to social services when appropriate.
- Continuing working with the family, sharing information and contributing to plans if the concern is investigated.
- Ensuring that all staff having contact with children, vulnerable adults and/or their families have received appropriate training on safeguarding issues.
- Being the first point-of-call for all staff who have safeguarding concerns.
- Taking part in safeguarding children training every 2 years and have ready access to relevant resources.
- Ensuring that there is an effective child/vulnerable adult safeguarding protection policy and staff code of conduct in place. Copies of these should be provided to all staff members and also be available for the public and parents to view.
- Ensuring that the child/vulnerable adult protection policies are reviewed annually and updated where necessary.
- Acting as a source of support, advice and expertise to staff members and help them to understand when it is essential to report their concerns.
- Keeping detailed, accurate and secure written records of concerns and referrals.
- Having knowledge of how local authorities conduct a child/vulnerable adult protection case conference and a child/vulnerable adult protection review conference, plus be able to attend and contribute to these effectively when required to do so.
- Working closely with the local authority and other relevant agencies.
- Deciding whether to make a referral to local authority social care when a concern has been made.

It is essential that the Designated Safeguarding Lead is given the time, funding, training, resources and support to perform these responsibilities successfully. This person has an important job to undertake and they must be able to do it as best as they can, without hindrance.

The DSL understands:

- The importance of information sharing with schools, other agencies, safeguarding partners, organisations and practitioners.

- Relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- The importance of keeping detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme etc.

A4.2. DSL Procedure

- Take any allegation/concern seriously.
- Conduct an investigation through interviews/written statements – all information received must be recorded ACCURATELY.
- Securely record and file ALL allegations including date/time/person against/victim/location/information source/action taken – date/time/by whom.
- Make an assessment regarding escalation to DSOs at local authority.
- Record actions if no escalation to include reason and recommendations. Review/close/date/time/closed by DSL/DDSL.
- If escalated to DSO, contact LA by phone to establish DSO details. Email details of concern to DSO:
    - Date/time/person against/victim/location/information source and await further instruction from DSO
    - Follow up any actions as necessary
    - Hand over case to DSO– date/time/DSO details
    - Close case – file ALL communications securely.

****Note**: **if alleged victim is deemed under immediate threat call 999 IMMEDIATELY**

Appendix 5

Restrictive Intervention / Reasonable Force Record

Submit the completed form to: sisafeguarding@supportingeducation.com

Learner Name: _____

Educator Name: _____

Date of Incident: ____ / ____ / _____

Time of Incident: _____

Location: _____

Other People Present: _____

---

1. Description of Incident

Provide a factual account of what happened immediately before, during and after the incident.

_____

_____

_____

_____

---

2. Reason for Intervention

Why was the intervention necessary?

☐ Prevent injury to the learner

☐ Prevent injury to others

☐ Prevent serious damage to property

☐ Prevent serious disruption posing a safety risk

☐ Other (please specify):

---

3. Type of Intervention Used

Describe the reasonable force or restrictive intervention used.

_____

_____

Duration: _____

---

4. Outcome

What was the outcome of the intervention?

_____

_____

---

5. Injuries or Distress

Were any injuries, marks, or signs of distress observed?

☐ No

☐ Yes (details below)

_____

_____

---

6. Follow-Up Actions

Actions taken after the incident:

☐ Parent/Carer informed

☐ School/Referrer informed

☐ Safeguarding team informed

☐ Incident reported on safeguarding system

☒ Other:

7. Educator Reflection

Could anything have been done differently to prevent or de-escalate the situation?

_____

_____

Declaration

I confirm that this record is an accurate and factual account of the incident.

Educator Signature: _____

Date: ____ / ____ / _____

Manager/Reviewer: _____

Date Reviewed: ____ / ____ / _____

Important: Record only factual observations. Avoid assumptions, opinions or emotional language. Submit this form to your designated safeguarding lead and complete any required safeguarding reporting procedures.

https://production-sgnresources-public.s3.eu-west-2.amazonaws.com/1710/KCSiE-Final-Version-September-2026-Your-guide-to-the-changes.pdf