

TLC Safeguarding Strategy



Introduction

1. The Safeguarding Strategy provides clarity on TLC's approach to safeguarding incidents, including how TLC responds to incidents that occur and the steps TLC takes to ensuring that it is proactive in its approach to keeping students safe.
2. The Designated Safeguarding Lead has overall responsibility over safeguarding incidents.
3. The Managing Director is responsible for TLC's approach to safeguarding, any strategy that is decided needs approval from the Managing Director.
4. The MD is responsible for ensuring that all personnel receive training on the procedures pertinent to their roles for the end-to-end safeguarding approach.
5. Every 6 months, an internal meeting with all staff members is required to take place in which the safeguarding staff review this strategy. It serves as an opportunity for any staff members to raise questions as to their required roles, and for staff to offer feedback on our safeguarding process.
6. It is the responsibility of the Designated Safeguarding Lead to ensure that all staff involved in the safeguarding process are confident and assured in their required roles.
7. In the event that any member is unaware of their required roles, it is imperative that they raise this with their relevant team lead and/or MD.

Statement Authorised By: Managing Director	Mr Rory Gaskin
Designated Safeguarding Lead	Mr Owais Yasin
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Contents

Section 1

TLC's Reactive Approach to Safeguarding: Safeguarding Concerns Raised.

Stage 1: Initial report

Stage 2: Investigating the Initial Report

Stage 3: Outcome(s)

Stage 4: Review

Information Sharing

Record Keeping

Section 2

TLC's Proactive Approach to Safeguarding

Stage 1: Recruitment

Stage 2: Training

Stage 3: Pre-Tuition Safeguarding Procedures

Stage 4: Monitoring of Tutorials

Stage 5: Post-Tuition Safeguarding Review

Stage 6: Ensuring Compliance

Section 3

Role of the Designated Safeguarding Lead

Section 4

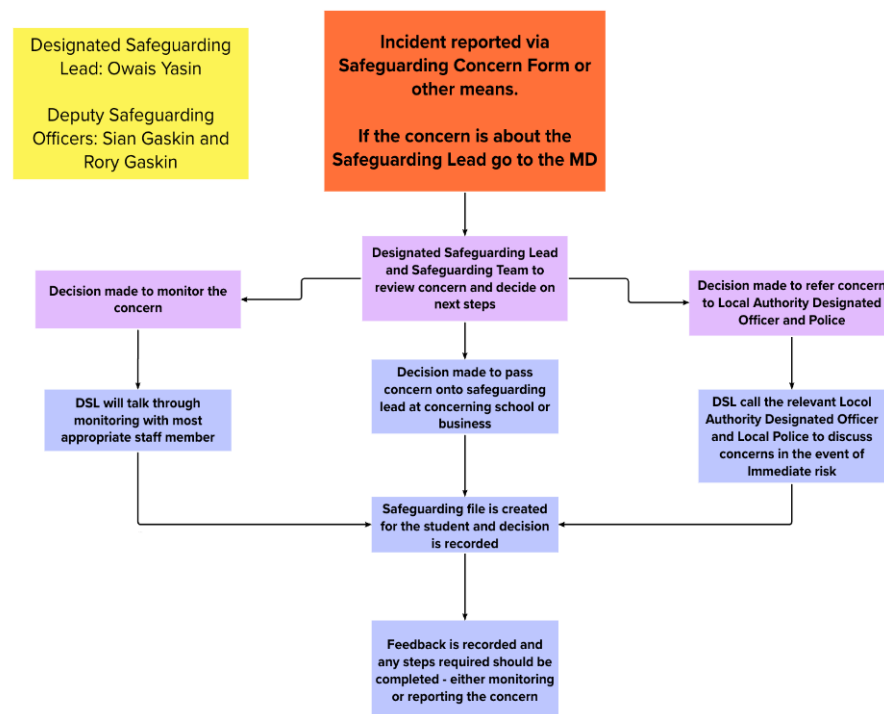
Evaluating and Reviewing our Safeguarding Procedures

Section 1 - TLC's Reactive Approach to Safeguarding: Safeguarding Concerns Raised

Key Staff and Responsibilities

Key Staff	Responsibilities
Managing Director (MD)	Stage 3 – Outcome; Stage 4 - Evaluation
Quality Assurance Lead	Stage 3 - Outcome
User Experience Lead	Stage 3 - Outcome
Designated Safeguarding Lead (DSL) and Deputies	Stage 1 – Initial Report; Stage 2 – Investigation of Report; Stage 3 – Outcome; Stage 4 - Evaluation
Technology Lead	Stage 1 – Initial Report; Stage 3 - Outcome

Overview of Safeguarding Reporting Pipeline



Working Days	Stage
0	Stage 1 – Initial Report
1-2	Stage 2 – Review of Report
3	Stage 3 – Outcome
10	Stage 4 – Evaluation of Response

Safeguarding Reporting Pipeline

1. Initial Report

- 1.1. When a concerned person observes a suspected safeguarding incident, an initial report is to be made using one of two ways: (1) by way of the [Reporting a Safeguarding Concern Form](#); or by informing a member of the Safeguarding Team by sending an e-mail to safeguarding@learnerscollective.com. Where a report is made via e-mail, the Safeguarding Team will then request that the concerned person completes the 'Reporting a Safeguarding Concern Form' (see Appendix 1) and sends it to the aforementioned e-mail.
- 1.2. The report should be a comprehensive written record of the incident, including the date, time, initials of the student and detailed notes regarding the event(s) witnessed by the tutor, the safeguarding concern and/or the disclosure made by the student or other party.
- 1.3. Tutors should remain invariably calm and reassure the other person that they are doing the right thing. Tutors may offer sympathy and comfort to that other party, and listen to them attentively, asking open questions in the process. Under no circumstances should the tutors:
 - 1.3.1. Make any assumptions or judgements about those involved in the safeguarding incident;
 - 1.3.2. Lead the other party into answering in a certain way or pressuring them for information than they are comfortable disclosing;
 - 1.3.3. Take actions into their own hands or encourage others to take any actions, save if strictly necessary when there is immediate risk of harm for any other parties involved;
 - 1.3.4. Discuss any disclosures made with anyone outside of the Safeguarding Team, save when required to do so by protection agencies or authorities; and
 - 1.3.5. Under exceptional circumstances where tutors cannot contact Safeguarding Team, they can contact the Local Authority Designated Officer or the relevant School's designated safeguarding lead to report the incident.

- 1.4. If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff, then:
- 1.4.1. This should be referred to the MD (rory@learnerscollective.com).
 - 1.4.2. Where there is a concern/allegation about the MD, this should be referred to the DSL and Legal and Finance Lead (owais@learnerscollective.com and legal@learnerscollective.com respectively).
- 1.5. If staff wish to raise concerns about poor or unsafe practices and potential failures in TLC's safeguarding provisions, then they should either:
- 1.5.1. Inform a member of the Safeguarding Team by sending an e-mail to safeguarding@learnerscollective.com; or
 - 1.5.2. Where a staff member feels unable to raise an issue directly, or feels that their genuine concerns are not being addressed, they should consult TLC's Whistleblowing Policy or, in any event, contact the [NSPCC Whistleblowing Advice Line](#).
- 1.6. If staff have a safeguarding concern or allegation about another member of staff that **does not** meet the harm threshold, then this should be shared in accordance with TLC's low-level concerns guidelines (See Safeguarding and Child Protection Policy and Procedures). TLC encourages tutors and staff to always report any concerns, no matter how small, even if it is simply a 'nagging doubt'.
- 1.7. The TLC safeguarding inbox and concerns form is monitored by the safeguarding team and checked at least 8 times every 24 hours. An internal record is kept to ensure the inbox is monitored.

- 1.8. All initial reports are stored by TLC in accordance with UK GDPR guidelines on sensitive, personal information and TLC's own Data Protection Policy.
- 1.9. TLC understands that both the timing of the response and the response itself are of vital importance. If the incident requires an immediate response in cases of emergencies, the concerned individual is advised to contract the relevant local emergency responders as outlined in our Safeguarding Policy and Procedures.
- 1.10. In an emergency, where there is immediate danger, make the situation as safe as possible, which could include, as necessary:
 - 1.10.1. Seeking medical attention as appropriate and following professional medical advice; and/or
 - 1.10.2. Contact the police by calling 999 and following their advice.

2. Investigating the Initial Report

- 2.1. When the report has been made, it is the responsibility of the Designated Safeguarding Lead (DSL) and any Deputy Safeguarding Officers to respond appropriately and efficiently.
- 2.2. The report is assessed by the team and the appropriate response will be discussed and decided within 24 hours of the initial report. The investigation will consist of, but is not necessarily limited to, reviewing the recorded tutorial concerned and/or meeting with the concerned parties to further understand the basis of the concern. This information will help the team to categorise the type of behaviour and determine what, if any, further action may need to be taken. This information will be recorded in writing along with the rationale for their decision and action taken.
- 2.3. The DSL will establish the level of concern and the necessary next steps required. Based on the level of harm and type of incident, the safeguarding team will decide to either:
 - 2.3.1. Take no further action;

- 2.3.2. Monitor the concern and/or;
 - 2.3.3. Inform the School's Designated Safeguarding Lead and/or;
 - 2.3.4. Make a referral to the Local Authority Designated Officer and/or emergency services.
- 2.4. Before any response is actioned, unless in the case of an emergency, prior approval is required by the Managing Director. A draft action report is sent to the Managing Director which details the recommended response to the safeguarding incident and the justifications that lead to that specific response. This serves as an additional control measure to ensure that the appropriate response has been decided.
- 2.5. If the Managing Director approves the response, it will be actioned immediately. If the Managing Director disagrees with the response put forward by the safeguarding team, the Managing Director will need to detail and justify the reasons for the inadequate response of the safeguarding team and posit a more appropriate response. The Managing Director and the safeguarding team will then decide which response is most appropriate with a vote, the response with the most votes will be actioned.¹
- 2.6. Where the concern/allegation relates to a report of sexual violence and/or sexual harassment, TLC will follow the procedures laid out in its Safeguarding Policy and Procedures.

3. Outcome

- 3.1. There are 5 typical responses to a safeguarding concern.²

3.1.1. Response 1: the concern is a low-level safeguarding concern.

¹ The Designated Safeguarding Lead will have the deciding vote in the event of a tie.

² Note these responses are not exhaustive and in exceptional circumstances a different response maybe required. There may also be more than one response to an incident, such as informing the School's Designated Safeguarding Lead and monitoring.

- 3.1.1.1. After having reviewed the tutorial recording and met with the concerned parties, the conclusion is reached that the concern is not a safeguarding issue per se but a low-level concern (see Clause 8.7. of TLC's Safeguarding Policies and Procedures).
- 3.1.1.2. The DSL will inform the MD of the low-level concern and in a timely fashion according to the nature of the particular low-level concern. The MD will be ultimate decision-maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL, the MD may wish to consult with the DSL and take a more collaborative decision-making approach. In the event, TLC is in doubt about whether a low-level concern meets the harm threshold, TLLC will consult with the LADO.
- 3.1.1.3. There are two responses to a low-level concern:
 - 3.1.1.3.1. No further action and/or informing any relevant personal such as school teachers.
 - 3.1.1.3.2. The low-level concern will either be monitored and/or TLC will inform the school DSL.
- 3.1.1.4. All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and action taken. The name of the individual sharing the concern will also be noted, taking into account as far as reasonably possible any wish of the individual to remain anonymous. The records are to be kept confidential, held securely and comply with the Data Protection Act 2018, and the UK GDPR.
- 3.1.1.5. Records of low-level concerns are to be regularly reviewed so that potential patterns of inappropriate, problematic and concerning behaviour can be identified. Where such a behaviour is identified, TLC will decide on a course of action, either through its disciplinary procedures or, where a pattern of behaviours moves from a low-level concern to meeting the harm threshold, referring the case to the LADO. Consideration will also be given to whether there are wider cultural issues within

TLC that enabled the behaviour to occur and, where appropriate, policies could be revised, or extra training delivered to minimise the risk of it happening again.

- 3.1.1.6. Where a staff member requests a reference from TLC, it will only include substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold. Low-level concerns will not be included in references, unless they relate to issues which would normally be included in a reference, e.g., misconduct or poor performance.

3.1.2. Response 2: monitor the concern.

- 3.1.2.1. This is a response to incidents that do not require an immediate action e.g., a student who is usually quite lively during tutorials has become distant and no longer engages with the lesson. The relevant members of staff and/or tutors are told to continue to monitor the situation. The Safeguarding Team will also closely monitor the tutorials by either: (1) observing the online lessons in real time; and/or (2) reviewing the recorded tutorials each week. An internal record will be kept of all observations. In most cases, the DSL will also inform the School's DSL of the report.

3.1.3. Response 3: making the relevant DSL at the school aware of the incident.

- 3.1.3.1. In some situations, the Designated Safeguarding Lead at the school are better equipped to handle the situation. The DSL will create an internal report that details the events of the incident, including the initial report and any follow-up correspondence with the parties involved. This will be a password-protected document sent via email to the DSL of the school and followed up with a phone call to explain the investigation so far. The safeguarding team will then await and comply with any action or decision of the School's Designated Safeguarding Lead.

3.1.4. **Response 4: Refer the concern to the Local Authority Designated Officer and, if necessary, Emergency Services.** This will be based on the type of incident and level of harm (e.g., physical abuse that occurs during the tutorial). If the incident reaches the harm threshold and the student requires an immediate response than LADO and the Emergency Services will be contacted. In these circumstances, the police/emergency services will make the school aware of any incidents before the morning of the next school day. TLC will also inform the school of in the event emergency services have been used.

3.2. In all responses, a safeguarding file is created for the student and the decision that was made in response to the incident is recorded on their file. This is also stored in accordance with UK GDPR guidelines and TLC's own Data Protection Policy.

4. Evaluation of Response

4.1. In order for TLC to better respond to safeguarding incidents in the future, TLC will evaluate their approach by analysing its responses to safeguarding incidents within 7 days. By analysing safeguarding responses, TLC can improve their current approach through updated training and/or reviewing current Safeguarding Policies and Procedures.

4.2. Safeguarding files that were created for incidents that occurred will be analysed in light of:

4.2.1. TLC's Safeguarding Policies and Procedures to see if they provided the correct procedures and if not, will the procedures need to be updated.

4.2.2. TLC's Safeguarding Risk Register. To see if the incident was anticipated or if it needs to be added to the risk register and assessed.

4.2.3. TLC's current safeguarding training and whether it helped provide the correct response and if there could be any improvements.

4.3. Prior approval from the Managing Director is required before actioning any updates or changes.

5. Information Sharing

- 5.1. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes.
- 5.2. TLC will therefore 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, whether this when problems are first emerging, or where a child is already known to local authority children's social care.
- 5.3. TLC recognises that the Data Protection Act 2018, and the UK GDPR places duties on TLC to process personal information fairly and lawfully and to keep the information they hold safe and secure. All staff will have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the aforementioned legislation. This includes:
 - 5.3.1. being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'; and
 - 5.3.2. understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

5.4. 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.

6. Record Keeping

6.1. All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Information is to be kept confidential and stored securely.

6.2. All records are to include:

6.2.1. A clear and comprehensive summary of the concern;

6.2.2. Details of how the concern was followed up and resolved; and

6.2.3. A note of any actions taken, decisions reached and the outcome.

6.3. All staff should note that in the event of any doubt, the DSL will be available to offer advice.

Section 2 - TLC's Proactive Approach to Safeguarding

Key Staff and Responsibilities

Key Staff	Responsibilities
Managing Director (MD)	Stage 5 - Post-Tuition Safeguarding Review
Quality Assurance Lead	Stage 4 - Monitoring of Tutorials; Stage 5 - Post-Tuition Safeguarding Review
User Experience Lead	Stage 2 - Training
Designated Safeguarding Lead (DSL)	All stages
Technology Lead	Stage 1 – Recruitment; Stage 2 - Training
Talent Acquisition Lead	Stage 1 - Recruitment

Overview of TLC's Proactive Approach to Safeguarding

Working Days	Stage
Ongoing	Stage 1 – Recruitment
Ongoing	Stage 2 – Training
Ongoing	Stage 3 – Informing all Stakeholders of Safeguarding Update
Within 14 days of Final Tutorial	Stage 4 - Pre-Tuition Safeguarding Procedures
Ongoing	Stage 5 - Monitoring of Tutorials

Within 14 days of Final Tutorial	Stage 6 - Post-Tuition Safeguarding Review
Within 14 days of receiving feedback	Stage 7 - Responding to School Feedback about Safeguarding Practices

TLC's Proactive Approach to Safeguarding

1. Recruitment

- 1.1. TLC's recruitment strategy has been developed in accordance with Keeping Children Safe in Education 2025 guidance. TLC's Safer Recruitment Policy details TLC's approach and strategy to Safer Recruitment.
- 1.2. In summary, TLC recruits only those tutors and staff who:
 - 1.2.1. understand their role and obligations to students with regards to safeguarding and child protection;
 - 1.2.2. pass TLC's 3-stage interview process, including an assessment of prior understanding of safeguarding and child protection needs (see Appendix 2);
 - 1.2.3. hold the relevant right to work documents, a valid Enhanced DBS and 2 references from previous employers.
- 1.3. These protective measures work to minimise the risk of unqualified or unsuitable staff or tutors from working with students.

2. Training

- 2.1. Tutors and staff must undergo TLC's safeguarding training when joining TLC. A detailed outline of TLC's training can be found in TLC Training Overview and Child Protection and Safeguarding Policy. In summary, all TLC staff and tutors – irrespective of whether they have contact with students - are level 2 Safeguarding trained (with the exception of the DSL and Deputy Safeguarding Officers who undergo more rigorous safeguarding training). Prior to teaching, all staff are required to prove that they have (1) read at least part 1 of the most recent KCSIE; and (2) understand the Prevent Duty (2015), a record of which is kept in the Single Central Record.
- 2.2. Tutors and staff also undergo a range of different safeguarding training, this includes:
 - TLC Individual Safeguarding and Child Protection Training Guide - with a Q&A multiple choice assessment.

3. Informing Stakeholders of Safeguarding Updates

- 3.1. All stakeholders and anyone who engages with TLC are informed of updates to our Safeguarding practice via email. For example, if any changes are made to our Safeguarding Policies and Procedures, all stakeholders will be informed via email about the:
 - 3.1.1. Effective date of the change;
 - 3.1.2. A summary of the changes.
- 3.2. Stakeholders are also given the opportunity to discuss any of the changes that are made either through email or any other form of communication.
- 3.3. TLC are currently in the process of creating a newsletter that summarises any key changes to TLC's safeguarding practice and any safeguarding highlights from the NSPCC and Keeping Children Safe.

4. Pre-Tuition Safeguarding Procedures

- 4.1. Prior to the commencement of the tuition services, the School's Tuition Coordinator and the DSL meet to provide an opportunity for TLC to reiterate its approach to safeguarding: the DSL will explain TLC's obligations to the School to ensure its commitment to safeguarding as well as any obligation of the School to aid TLC's own internal processes and vice versa. It will also provide the Tuition Coordinator a further opportunity to address any safeguarding concerns, including informing TLC of any ongoing safeguarding concerns or particular needs for any students who will be partaking in the tuition programme.
- 4.2. Following the discussion, the Tuition Coordinator is asked to sign a Safeguarding Confirmation Letter as proof that they have read and understand TLC's Safeguarding Policies and Procedures. These Safeguarding Policies and Procedures will also form part of the School Service Agreement.

5. Monitoring of Tutorials

- 5.1. All TLC tutorials are monitored and recorded for safeguarding purposes by the Safeguarding Team. The tutorial recordings are stored in accordance with UK GDPR guidelines and TLC's own Data Protection Policy.
- 5.2. Tutorials are monitored by the Safeguarding Team both systematically and regularly, this is an ongoing process as part of TLC's Safeguarding Strategy. TLC will review at least one tutorial per Tutor per academic term.
- 5.3. The tutorials are monitored live during the tutorial and after by viewing the recorded tutorials to identify any safeguarding incidents. If a safeguarding incident arises, the above steps in the previous section are followed.
- 5.4. When reviewing the tutorials, the Safeguarding Team will monitor for (1) any potential safeguarding issues and (2) if appropriate, the tutor's response to any potential safeguarding issues. It is the responsibility of the Safeguarding Team to report any incidents that occur when monitoring tutorials.
- 5.5. Where a tutor behaves inappropriately, TLC will suspend their tutoring immediately pending an investigation. The DSL will arrange to meet with concerned tutor to discuss TLC's concerns. The appropriate action will be taken as a response which may include contacting the relevant authorities and ceasing to work with the tutor any further.
- 5.6. Where a tutor displays a poor response to a potential safeguarding incident, the tutor may be suspended from teaching and required to undertake further safeguarding training. The DSL will complete a Tutor Support Plan (see [Appendix 3](#)) and will arrange a review date to assess the tutor's progress. Where the tutor has made insufficient progress, TLC may choose to cease working with the tutor any further.

6. Post-Tuition Safeguarding Review

- 6.1. After concluding tuition with a school, the DSL will conduct a review of the TLC's approach to safeguarding throughout that course of tuition. The DSL will also gather feedback from the school including the school's Designated Safeguarding Lead to discuss, if any, changes or improvements can be made.
- 6.2. A review of tutorials recordings where a safeguarding incident occurred will be made and any the responses from tutors will be analysed. The assessors will review for both positive and concerning action taken by tutors which will be used as scenarios during training so staff and tutors have practical guidance on responding to safeguarding incidents. Excellent responses may be used to inform and improve any TLC Safeguarding Policies and Procedures.
- 6.3. Safeguarding Strategy and all other safeguarding policies and procedures will be reviewed every 6 months to identify any improvements and will be updated accordingly, with the approval of the Managing Director.

7. Responding to School Feedback about Safeguarding Practices

- 7.1. TLC encourages all stakeholders including schools to share any feedback on TLC's Safeguarding Policies and Procedures.
- 7.2. If TLC receives feedback in any form (e.g. via email or by way of a complaint) from schools or any other stakeholders on any of their Safeguarding practices, TLC will:
 - 7.2.1. Organise a meeting with the concerned party within 7 days of receiving the feedback, to further understand the basis and details of the feedback;
 - 7.2.2. A report will be created including the initial feedback and details from the meeting;
 - 7.2.3. The Safeguarding team will then review the relevant policies or practices based on the feedback and create an action plan that details the relevant changes and updates that are necessary to said practices. The action plan is added to the report and sent the Managing Director for approval.

7.2.4. Upon receipt of the report, within 7 days The Managing Director will;

7.2.4.1. Approve the updates without any changes;

7.2.4.2. Partially approve the update pending some recommended changes;

7.2.4.3. Disapprove the update and detail the reasons for disapproval.

7.2.5. If the update has been approved:

7.2.5.1. the Safeguarding team will implement the changes and inform all relevant stakeholders via email.

7.2.6. The update is partially approved pending some recommended changes:

7.2.6.1. The report will be amended by the Safeguarding Team and the changes will be implemented. All relevant stakeholders will be informed of the changes via email.

7.2.7. The update has been disapproved:

7.2.7.1. The Managing Director will have to list his reasons for the disapproval and the safeguarding team will either;

7.2.7.1.1. Re-review the report and recommend a new update which will be sent to the Managing Director for approval (the previous procedure will apply);

7.2.7.1.2. Reject the Managing Directors disapproval, in this case the Safeguarding Team, Managing Director and the Team Leads will vote on whether to approve the changes, in the event of a tie the deciding vote will go to the DSL.

7.2.7.2. If the vote passes in favour of the Safeguarding Team to approve the changes, and the changes will be implemented. All relevant stakeholders will be informed of the changes via email.

7.2.7.3. If the vote passes in favour of the Managing Director the report will be re-reviewed by the safeguarding team and recommend a new update which will be sent to the Managing Director for approval (the previous procedure will apply).

8. Procedures to ensure compliance

- 8.1. All staff read the Safeguarding and Child Protection Policies and Procedures, including the Online Safety Policy and understand their responsibilities and will acknowledge in the writing.
- 8.2. TLC and the DSL will keep abreast of any changes to legislation or best practices and update the Safeguarding and Child Protection Policy at least on an annual basis, or sooner if required for changes in legislation.
- 8.3. TLC will provide professional development to tutors and staff pertaining to safeguarding and child protection that TLC deems suitable and necessary for the best quality of care to be delivered to students. This will be provided through a combination of email broadcasts, online and/or in-person training, and third-party training where required.
- 8.4. In addition to continuing professional development, the DSL holds a DSL Level 3 certificate, which will be renewed no later than twice annually. The two deputies hold a Level 2 certificate in Safeguarding.

The Designated Safeguarding Lead

1. TLC ensures that an appropriate senior member of staff is appointed to the role of designated safeguarding lead (DSL). As of 01/09/23, the DSL is Owais Yasin.
2. The DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This is made explicit in the DSL's job description (see Appendix 4).
3. TLC ensures that the DSL has the appropriate status and authority within TLC to carry out the duties of the post. The role carries a significant level of responsibility and the postholder will be given the additional time, funding, training, resources, and support needed to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding, and child protection matters, taking part in strategy discussion and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy Designated Safeguarding Leads

4. TLC also ensures the appointment of at least two deputy designated safeguarding leads.
5. All deputies will be trained to the same standard as the DSL and the role should be explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL – this lead responsibility may not be delegated.

Availability

6. During term time, the DSL will always be available during working hours for staff to discuss any safeguarding concerns. The DSL will be available to meet online, via the phone and, where necessary, in person.
7. Where an emergency safeguarding issue arises, the DSL will be available for contact via the safeguarding email and contact number provided.

Manage Referrals

8. The DSL will be expected to refer cases:

- 8.1. Of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- 8.2. To the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- 8.3. Where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- 8.4. Where a crime may have been committed to the Police as required. [NSPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.

Working with Others

9. The DSL will be expected to:

- 9.1. Act as a source of support, advice, and expertise for all staff;
- 9.2. Act as a point of contact with the safeguarding partners;
- 9.3. liaise with the MD to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance [- PACE Code C 2019](#).
- 9.4. As required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;

- 9.5. liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- 9.6. liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health;
- 9.7. promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- 9.8. work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
 - 9.8.1. ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
 - 9.8.2. supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information Sharing and Managing the Child Protection File

- 10. The DSL is responsible for ensuring that child protection files are kept up-to-date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child (see 'Record Keeping').
- 11. The DSL will ensure that the file is only accessible by those who need to see it and where the file or its contents are shared, this happens in line with Parts One and Two of KCSIE 2025.

Raising Awareness

12. The DSL will:

- 12.1. ensure each member of staff has access to, and understands TLC's child protection policy and procedures, especially new and part-time staff;
- 12.2. ensure TLC's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- 12.3. ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of TLC in this;
- 12.4. link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- 12.5. help promote educational outcomes by sharing information about welfare, safeguarding, and child protection issues that children who have or have had a social worker are experiencing.

Training, Knowledge and Skills

- 13. The DSL (any all deputies) should undergo training to provide them with the knowledge and skills required to carry out this role, including biannual renewal. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training.
- 14. Training will provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- 14.1. understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- 14.2. have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- 14.3. understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children;
- 14.4. understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- 14.5. are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- 14.6. understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- 14.7. understand and support TLC with regards to the requirements of the Prevent duty and are able to provide advice and support to staff protecting children from the risk of radicalisation;
- 14.8. are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online;
- 14.9. can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- 14.10. obtain access to resources and attend any relevant or refresher training courses, and

14.11. encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures TLC may put in place to protect them.

15. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing Support to Staff

16. Training will also support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

16.1. Ensure that staff are supported during the referrals processes, and

16.2. Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the Views of Children

17. TLC recognises the importance of all children feeling heard and understood. Therefore, the DSL (and all deputies) will be supported in developing knowledge and skills to:

17.1. encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures TLC may put in place to protect them, and

17.2. understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and Sharing Information

18. The DSL will also be equipped to:

- 18.1. understand the importance of information sharing, both within TLC, and with other tuition partners, schools and colleges and with the safeguarding partners, other agencies, organisations and practitioners;
- 18.2. understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- 18.3. be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Evaluating and Reviewing our Safeguarding Procedures

It is essential to our child protection plan that we are constantly reviewing and evaluating our policies to ensure we are reactive to a changing environment, legislation and best practice.

We do this by ensuring our reporting and monitoring functions are under ongoing review and evaluation.

Stakeholder Feedback

TLC monitor and reviews feedback in three crucial ways:

1. Candidate Feedback/Reporting

- TLC ensures tutors have access to multiple training and educational functions and ensure our candidates are aware of their responsibility through our mandatory training function.
- We invite candidates in specific specialisms to relevant online or offline courses to meet their development needs.
- We send feedback surveys to our candidates at the end of every assignment to fully understand if we are meeting their expectations and, if not, we ask how to improve our communication around crucial safeguarding issues.

2. School Feedback/Reporting

- TLC ensures tutors have access to multiple training and educational functions and ensure our candidates are aware of their responsibility through our mandatory training function.
- Schools are able to report any concerns through multiple channels; including via our centralised email address, through their personal school liaison, via our DSLs, their own consultant, or via our Managing Director.
- These contact details are sent upon initial engagement, when first bookings are made and throughout the process
- Personal school liaison officers are required to connect with their contacts, on at least a weekly basis, to ensure that the school have an easy communication route to report even the lowest level concerns.
- We send feedback surveys to our clients at the end of every assignment to fully understand if we are meeting their expectations and, if not, we ask how to improve our communication.

Internal Review Processes

TLC values safeguarding as a key priority and this is reflected in the value placed on safeguarding at board level.

- Our User Experience Team meets weekly to ensure strong cross-department communication. Our DSL, Owais Yasin, presents a weekly safeguarding and compliance update to the Team which is cascaded to all teams. Minutes are recorded and recapped at the beginning of the next meeting.
- This is further backed by TLC's monthly SLT meetings – and annual Shadow Board meetings – where our DSL presents to the Board any potential safeguarding or compliance concerns. This allows the organisation as a whole to have an input into any preventative measures that TLC may need to put into place to assist with safeguarding. Minutes are recorded and recapped at the beginning of the next meeting.
- We understand safeguarding is not just about our external stakeholders but also ensuring all of our internal processes are secure.
- All safeguarding related policies are reviewed on a biannual basis and we work with the DfE by attending all safeguarding and compliance webinars. This allows us to make additional changes to our policies in between review periods.
- On a termly basis, we will assess safeguarding incidents to look for patterns. If patterns of concern are identified across the business, we will respond by offering additional support to our candidates and schools. This information is held securely within our Centralised Incident Report Spreadsheet and backed up within our CRM (please note this is not accessible to those outside of the DSL team)

Auditing

We complete our own internal audit on a monthly basis, during which our Quality Assurance Lead selects a random sample of each Compliance Officer's work to check against quality of compliance processes and to identify learning needs. This involves a 5% sample size checked monthly, alongside more advanced 10% samples during the summer when schools break for the end of the academic year. This allows us to ensure that safer recruitment guidelines are always being followed.

Our CRM allows us to constantly monitor changes within a candidate's file to ensure that the following areas are updated to meet the correct criteria:

- DBS renewals
- Regular DBS update checks (yearly)
- Regular TRN checks (yearly)

- Right to work checks (as and when required)

Any candidate who has a gap of 84 or more days is required to restart the entire compliance process.

School Communications

TLC is committed to communicating its safeguarding mission and policies through the following channels:

- All policies are available through our website.
- Upon initial engagement with schools, our terms of business and safeguarding policies are forwarded to key school contacts before we discuss recruitment needs.
- Our Safeguarding and Recruitment policies are attached to each Order Confirmation.
- Contact details for our DSL and other important contacts are listed within all relevant policies.

Continuous Monitoring and Evaluation of the Safeguarding Risk Register

As part of our ongoing commitment to safeguarding, we understand the importance of continuously monitoring and evaluating our Safeguarding Risk Register to improve the safety of students.

Annual Formal Reviews

At the start of every academic year, we organise an annual formal review of the Safeguarding Risk Register to which we invite all staff. The most recent risk register will be circulated to attendees prior to the meeting.

At the outset, our Designated Safeguarding Lead presents our most recent assessment of risks, including how we have responded to the previous year's recommended further mitigations and the subsequent impact, if any, on the current risk rating. We then invite attendees to raise any concerns about the assessment of any risk, including suggestions for any omitted risks. Following this feedback, the DSL will work with the wider Safeguarding Team to produce an updated risk register, which will serve as a starting point for the rest of the academic year.

Informal Monthly Reviews

Each month, the SLT holds an informal meeting in which they will review the Safeguarding Risk Register. This will involve reviewing any implantation of the recommended mitigations to reduce risk rating, updating the controls in place and, if necessary, re-evaluating the current risk rating. At the end of the meeting, the SLT will also direct any necessary changes to the relevant department lead.

Formal Review in Response to Safeguarding Concern

Where a safeguarding concern is reported, the SLT will review always review the Safeguarding Risk Register in light of the raised concern.

For more info, please see Section 4 of the Safeguarding Report Pipeline, esp. pg 12.

Note: All updates and reviews will be recorded in the 'Ongoing Monitoring and Review' tab of the Safeguarding Risk Register.

Appendix 1

Reporting Safeguarding Concerns Form



Reporting Safeguarding Concerns Form

The Learners Collective ("TLC") is committed to safeguarding and promoting the welfare of children and young people. We expect all TLC staff, tutors and other members of the organisation to share this commitment.

This form can be used to report any safeguarding concerns that a member of staff or tutor has regarding any students.

If you are unsure about whether an incident constitutes a safeguarding, low-level or non concern, please report the incident anyway or speak to the Designated Safeguarding Lead.

We may need to contact you about your safeguarding concern, your details will only be used for safeguarding purposes. For further information on how we use data please refer to the TLC Privacy Policy.

If you think someone is at risk, it is essential that you report it. If you would rather, you can call email TLC at safeguarding@learnerscollective.com

* Required

1. Full Name *

Appendix 2

Question	Positive Indicators	Negative Indicators
Motivation for working with children		
- What attracted you to teaching/this post/this school? - How do you think your own childhood may have influenced your own practice? Possible follow ups: How? Why? What is the impact/result? - Tell us about your interests outside of work. - What motivates young people?	Genuine interest in the education and welfare of children. Understanding of children's needs and expectations. Self-awareness of impact on others. Strong examples of own experiences dealing with children in an appropriate and developmental manner.	Wanting role to meet own needs <u>at the expense</u> of children's needs. Inappropriate language when talking about children. Weak or vague examples of past experiences. No self-awareness. Emotional immaturity.
Understanding of child protection principles		
- What do you think are the professional challenges facing school staff today? Possible follow ups: Have you experienced any of these? How did you deal with them? What do you do to avoid them? - What would you do if you were concerned about a colleague's behaviour towards children? - What makes a school a safe and caring place? Possible follow ups: How have you contributed to this? - What policies are important to support a safe environment? Possible follow ups: Why are these important? - What are staff's responsibilities in protecting children? - Tell us what you have done in the last 12 months to actually improve child protection in the workplace?	Awareness of child protection principles. Up to date knowledge of legislation and current policies and practices. Strong examples of own experiences of developing/ strengthening/ embedding child protection policies and/or practices. Proactive and committed to safeguarding – sees it as part of the day job, not an 'add on'. Prepared to challenge working practices and colleagues if necessary. Willingness and eagerness to work with others to improve safeguarding.	No awareness or appreciation of child protection principles or current legislation. Weak or vague examples of past experiences or involvement in child protection issues. Passive approach to safeguarding – only paying 'lip service' to it. Unwilling to challenge practice and procedure, or to make changes where necessary. Reluctance to work and share practice with others.
Boundaries and inappropriate behaviour		
Give an example of where you have had to deal with bullying behaviour between pupils. Possible follow ups: What was the result?	Self-awareness of impact on others.	Unclear about boundaries with children.

Who did you involve? What was the impact on other children? How did you know? ▪ Give an example of how you have managed poor pupil behaviour. ▪ Young people can develop 'crushes'. How would you deal with this? Possible follow ups: Have you had experience of this? How would/ do you avoid this? ▪ Give an example of how you have responded to challenging behaviour. Possible follow ups: How did it affect you emotionally? Why did you respond in this way? What impact did it have on their learning and interaction with other children/ you? ▪ When do you think it is appropriate to physically intervene in a situation involving young people? ▪ How do you define an appropriate staff – pupil relationship? ▪ Give examples of what you would consider to be appropriate and inappropriate behaviour between or toward staff and pupils. ▪ Tell us about how you have dealt with a child with 'difficulties'.	Awareness of appropriate boundaries and behaviour. Appreciation of the differences in levels of appropriateness when dealing with adults and children. Appreciation of the challenges involved with working with children. Strong examples of own experiences dealing with difficult or vulnerable situations in an appropriate manner. Self-management when dealing with difficult or emotional situations.	Using inappropriate language when talking about children – e.g. Weak examples of past experience dealing with difficult or vulnerable situations. No appreciation of the importance of boundaries and children's needs. Lack of self-awareness or self-management techniques when dealing with difficult or vulnerable situations.
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Appendix 3

Tutor Support Plan (TSP)

Tutor:		Assessor:	
Date of Review:		Date of Next Review:	

Objective	Success Criteria – how will I know if I have met this objective?	Key areas for development based on an analysis of performance	What support do you need to meet this objective?	Time scales	Evidence base – what will be monitored and kept as evidence in relation to this objective?