

## The Learners Collective – Child Protection and Safeguarding Policies and Procedures

Statement Authorised By: Managing Director	Mr Rory Gaskin
Designated Safeguarding Lead	Mr Owais Yasin
Reviewed on:	01/09/2023  Updated regulations in accordance with government guidance (KSCIE 2023)
Next Review Due:	01/09/2024 (KCSIE 2024)

### 1. Introduction:

- 1.1. The Learners Collective (“TLC”) is committed to ensuring the highest possible standard of safeguarding. The personal safety and wellbeing of each Student and Tutor using TLC is paramount. All Directors, TLC Executive Suite and Staff and Tutors must share this commitment. This forms part of TLC’s company-wide approach to child protection.
- 1.2. TLC requires that Tutorials take place in a safe environment. This is reflected in this Safeguarding Policy and the Safeguarding Procedures for the Students, parents/guardians/responsible adults, Tutors, Directors, TLC Executive Suite and Staff and any other person or persons who engage with TLC.
- 1.3. The safety and wellbeing of any Student or other person using TLC is paramount. This policy aims to demonstrate TLC’s commitment to safeguarding under its statutory responsibilities; ensure a prompt response to any incident and to minimise any further harm to a Student or any other person that comes into contact with TLC.
- 1.4. It is always the responsibility of the person alerted to the incident to take some action to protect the Student or other person. TLC will apply vigorous risk management procedures to identify and act on safeguarding situations and will make professional judgements to protect those involved, from harm.
- 1.5. The procedures are not an exhaustive list; therefore, if an incident occurs that is not covered in this document which you believe to be a safeguarding issue, you are advised to submit a [safeguarding report](#).
- 1.6. TLC will continually manage, monitor and update this provision in light of the latest statutory guidance and best practice and ensure that safeguarding is a core aspect of all areas in the organisation. We will use information such as:
  - 1.6.1. Minutes of meetings related to child protection and safeguarding.
  - 1.6.2. Surveys and feedback from both students and staff.
  - 1.6.3. Review of records of bullying/racists/sexually inappropriate incidents.
  - 1.6.4. Content of appropriate training courses.
  - 1.6.5. Observational data of education provision.
  - 1.6.6. Feedback from external safeguarding agencies.
  - 1.6.7. Minutes from Shadow Board meetings.
  - 1.6.8. Internal compliance audits.

1.7. For more information as to our processes for evaluating and reviewing our safeguarding procedures, please see our Safeguarding Strategy..

1.8. To reduce the possibility of abuse or safeguarding breaches and protect persons from harm, TLC understands that all those who engage with TLC must read and understand Safeguarding Policies and Procedures, know how to report and handle incidents according to Safeguarding Policy and Procedures and if necessary, report to relevant authorities.

## **2. Designated Safeguarding Lead (DSL)**

2.1. The Named Designated Safeguarding Lead (DSL) and Deputy Safeguarding Officers (DSO) will be provided with the appropriate level of training to enable them to fulfil their responsibilities in supporting and guiding staff and tutors on safeguarding matters. The training should be updated every two years. They are responsible for responding to initial concerns or disclosures.

2.2. The Named Designated Safeguarding Lead and Deputy Officers will:

- Provide ready and accessible support and guidance to all staff, tutors, leadership team members, executive officers and the managing director on safeguarding matters.
- Manage all safeguarding reports and act as liaison for statutory services during any criminal or safeguarding investigation.
- Act as the main point of contact in the event of any allegation or disclosure; and
- Act as the main point of contact between TLC and partner schools.
- Ensure that serious incidents relating to safeguarding are reported immediately and managed effectively.
- Report allegations against the managing director, executive officers, leadership team members, staff, or tutors to the relevant Local Authority and Disclosure and Barring Service as required.
- Ensure accurate records of all safeguarding concerns and the secure storage of all safeguarding records.
- Ensure that all TLC staff are sufficiently vetted.
- Provide a quality assurance and review function for all safeguarding concerns.
- Work with all the above governance bodies to inform of serious or untoward safeguarding incidents as appropriate.
- Ensure the adoption, implementation and auditing of all policies and strategies in relation to safeguarding.
- Liaise with school Designated Safeguarding Leads on matters of safety and safeguarding, in particular online and digital safety involving TLC tutors, when deciding whether to make a referral to the relevant agencies.
- Responsible for online safety and understanding the filtering and monitoring systems and processes in place.

2.3. If there is an allegation, if signs and indicators of abuse are identified or if at any point an adult involved with TLC's work fails to comply with any elements of the Child Protection and Safeguarding Policies and Procedures, this information must be immediately passed to the DSL. It is the responsibility of the DSL to collect all relevant information and make decisions on how to proceed (this will include contacting the DSL at the relevant partner school(s)).

For an outline of the role of the Designated Safeguarding lead, please see TLC's Safeguarding Strategy.

**Safeguarding Team Email:** [safeguarding@learnerscollective.com](mailto:safeguarding@learnerscollective.com)

### **Designated Safeguarding Lead**

Name: Owais Yasin

Email: [owais@learnerscollective.com](mailto:owais@learnerscollective.com)

### **Deputy Safeguarding Officer**

Name: Sian Gaskin

Email: [sian@learnerscollective.com](mailto:sian@learnerscollective.com)

## **Managing Director**

Name: Rory Gaskin

Email: [rory@learnerscollective.com](mailto:rory@learnerscollective.com)

### **3. Definitions**

- 3.1. Safeguarding and promoting the welfare of children means:
  - 3.1.1. Protecting children from maltreatment.
  - 3.1.2. Preventing impairment of children's health or development.
  - 3.1.3. Ensuring that children grow up in circumstances consistent with the provisions of safe and effective care.
  - 3.1.4. Taking action to enable all children to have the best outcomes.
- 3.2. Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- 3.3. Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Annex 4 explains the different types of abuse.
- 3.4. Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Annex 4 defines neglect in more detail.
- 3.5. Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children. See Annex 4 for more detail.
- 3.6. Children includes everyone under the age of 18.
- 3.7. The following three safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). Schools work with the safeguarding partners for their local area. The three safeguarding partners will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
  - 3.7.1. The local authority (LA)
  - 3.7.2. A clinical commissioning group for an area within the LA.
  - 3.7.3. The chief officer of police or a police area in the LA area.

### **4. Equality Statement**

- 4.1. Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- 4.2. We give special consideration to children who:
  - 4.2.1. Have Special Educational Needs (SEN) or disabilities (see section 13)
  - 4.2.2. Are young carers.
  - 4.2.3. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
  - 4.2.4. Have English as an additional language.
  - 4.2.5. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
  - 4.2.6. Are at risk of FGM, sexual exploitation, forced marriage or radicalisation.
  - 4.2.7. Are asylum seekers.
  - 4.2.8. Are at risk due to either their own or a family member's mental health needs.
  - 4.2.9. Are looked after or previously looked after (see section 16).

## **5. Staff responsibilities**

5.1. All staff will read and understand Part 1 (unless specifically told to read Annex A instead) of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

5.2. All staff will be aware of:

5.2.1. Our systems which support safeguarding, including this Child protection and Safeguarding Policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputy, the behaviour policy, the online safety policy, and the safeguarding response to children who go missing from education.

5.2.2. The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

5.2.3. How to contact our DSL who will liaise with the child's school. The child's school will make a further referral to the relevant local authority children's social care and may conduct statutory assessments that may follow a referral.

5.2.4. The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

5.2.5. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe. They should know how to maintain an appropriate level of confidentiality while also not promising a child that they won't tell anyone else about the report.

5.2.6. The process of making a referral to children's social care and statutory assessment under the Children Act 1989.

5.2.7. How to maintain an appropriate level of confidentiality and the importance of recording and information sharing.

5.2.8. Their roles and responsibilities in relation to filtering and monitoring.

5.2.9. The fact that children may not always be aware that they are being abused, neglected or exploited and that this should not prevent staff from contacting the DSL about their concerns.

5.3. See Section 11 and Annex 5 of this policy for more detail on how staff are supported to do this.

## **6. The Designated Safeguarding Lead Responsibilities**

6.1. The DSL will be given the time, funding, training and resources and support to:

6.1.1. refer cases 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;

6.1.2. refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;

6.1.3. refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required;

6.1.4. refer cases where a crime may have been committed to the police as required;

- 6.1.5. act as a point of contact with schools and colleges and their three safeguarding partners;
- 6.1.6. liaise with the headteacher or principal of schools and colleges to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations (this includes 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);
- 6.1.7. confirm to schools and colleges that all processes and procedures with regard to safeguarding and safer recruitment are in place and adhered to;
- 6.1.8. as required, liaise with the case manager and the Local Authority Designated Officer(s) (LADO) at the local authority for child protection concerns in cases which concern a staff member;
- 6.1.9. liaise with schools and colleges on matters of safety and safeguarding (including online and digital safety and regarding concerns linked to mental health) and when deciding whether to make a referral to relevant agencies;
- 6.1.10. act as a source of support, advice and expertise for all staff;
- 6.1.11. ensure the Child Protection and Safeguarding Policy and Procedures are understood and used appropriately;
- 6.1.12. ensure the Child Protection and Safeguarding Policy and Procedures is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly;
- 6.1.13. ensure the Child Protection and Safeguarding Policy and Procedures is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the company in this;
- 6.1.14. make sure staff are aware of any training opportunities and the latest policies on safeguarding arrangements;
- 6.1.15. help promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children in need, including children with a social worker, are experiencing or have experienced, with teaching and the leadership staff;
- 6.1.16. carry out safeguarding spot checks on tutors and, detailing any safeguarding concerns raised and actions in line with our safeguarding reporting processes.

6.2. The full responsibilities of the DSL are set out in their job description.

## **7. Tutor Responsibilities**

- 7.1. All tutors have a duty of care towards their tutees. You are expected to deliver Tutoring Services in a professional manner with due skill, diligence, and care. In addition, tutors are responsible for ensuring their students well-being and protecting their best interests, by following the highest standards of professionalism and exemplary practices to foster a safe learning environment for all parties.
- 7.2. The tutor's main responsibilities with regards to safeguarding are set out below. This is a non-exhaustive list, and tutors should use their professional judgement to ensure that they meet their safeguarding obligations to tutees.

- 7.3. Maintaining a professional demeanour and always following TLC's Tutor Code of Conduct and the terms of the TLC Representation Agreement.
- 7.4. Making students feel safe and building a bounded relationship of trust, where students feel comfortable to discuss their concerns.
- 7.5. Maintaining a professional relationship with the student - which means they should not engage you on social media; no contact details should be shared (and vice versa); and generally refraining from sharing inappropriate personal information with the student or interacting in any way with the latter outside of the boundaries of an appropriate tutor-tutee relationship.
- 7.6. Maintaining appropriate boundaries with all stakeholders (parents, students, teachers, other tutors or TLC staff) and not using their position for personal benefit or gain, outside of an appropriate educational provision.
- 7.7. Maintaining respect for all other stakeholders, including their background, sexual orientation, beliefs, values, relationships and affiliations, and refraining from any form of discrimination.
- 7.8. Refraining from entering into discussions with parents, students or other tutors if they have any concerns about a third party, be it another student, parent or tutor. Any concerns should be kept confidential and communicated to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.
- 7.9. Recording and reporting anything that may be a cause for concern to the Designated Safeguarding Lead or to the Deputy Designated Safeguarding Lead, always remembering to be factual and not to make assumptions, regardless of the nature of the concern. Reports may include concerns about the student, the student's family members or any other party. Where you are not sure whether something that concerns you needs to be reported, always err on the side of caution and discuss this with Designated or Deputy Safeguarding Lead.
- 7.10. Keeping any personal information about students confidential, especially if it is of a sensitive nature, and taking all reasonable measures to prevent any third parties from gaining access to this information, for example through a computer, mobile phone or other electronic device.
- 7.11. Avoiding any direct confrontation with anyone who has allegedly been involved in a situation of abuse or other safeguarding concern and allowing the appropriate authorities to take action.
- 7.12. Collaborating with protection agencies or authorities in providing information about a concern when asked to do so by the latter, always remembering to be completely factual and to avoid making any assumptions.
- 7.13. Completing all professional development requirements pertaining to safeguarding and child protection suitable and necessary for the best quality of care to be delivered to students, including the latest Keeping Children Safe in Education, Part 1, among other relevant documents.

## **8. Staff Training Requirements**

- 8.1. While TLC internal staff may not regular contact, if any, with students within our schools, we still believe it is essential that they fully understand their responsibilities to ensure all children and vulnerable adults are protected from harm.
- 8.2. All TLC staff are required to complete the following training:
  - TLC Individual Safeguarding Training and Child Protection Training Guide
  - TLC Live Group Safeguarding and Child Protection Training including Online Safety Training
  - External Safeguarding Training from High-Speed Training with a Q&A Multiple Choice Assessment (this must be recapped at least once a year)
  - Prevent Duty – Course 1 Training (this must be recapped at least once a year)
  - Safer Recruitment Induction delivered by our DSL to ensure a full understanding of our responsibilities to our schools and their students

- Read and understand Part 1 of KSCIE (most recent edition September 2023)
- Safeguarding refreshers on a termly basis, delivered by the DSL (or deputies).
- Read and understand the TLC Staff and Tutor Code of Conduct.

## 9. Staff that have lived or worked overseas

9.1. TLC continuously works with and represents staff who have lived or worked overseas and have the Right to Work in the UK. TLC's reporting approach for these members is the same as those who have not lived or worked overseas.

TLC will always endeavour to follow the same policy and procedures and notify the relevant local authority equivalent where possible. See our Safer Recruitment Policy for more information.

## 10. Confidentiality

10.1. TLC respect confidentiality and data protection legislation. We understand the need to protect sensitive and confidential personal data and we only ever share data for child protection and safeguarding reasons. Where there is concern, we will share information with the child's school, safeguarding partners and other agencies, where relevant, in accordance with data protection legislation and safeguarding legislation and guidance.

10.2. All staff should note that:

- 10.2.1. Timely information sharing is essential to effective safeguarding.
- 10.2.2. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- 10.2.3. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- 10.2.4. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- 10.2.5. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- 10.2.6. The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- 10.2.7. If staff are in any doubt about sharing information, you should speak to the designated safeguarding lead (or deputy).

## 11. Online Safety

11.1. TLC aims to protect all members of its organisation and those who engage with TLC in their use of technology especially through the platforms provided by TLC. All communication between tutors and students take place via TLC's specified communication platforms. Personal details about the student and their parents/carers (including email addresses and telephone numbers) remain private and confidential and are not visible to the tutor. We have established mechanisms to identify, intervene in and escalate any concerns where appropriate.

11.2. All staff and tutors should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content (KSCIE 2023, part 1, para 24).

11.3. As outlined in KCSiE 2023 (part 1, para 136) TLC recognise the breadth and depth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

11.3.1. **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;

11.3.2. **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;

11.3.3. **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

11.3.4. **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the [Anti-Phishing Working Group](#).

11.4. **To meet to meet our aims and address the risks above we will:**

11.4.1. Educate students about online safety through our [Online Safety Policy](#). For example:

11.4.1.1. The safe use of social media, the internet and technology.

11.4.1.2. Keeping personal information private.

11.4.1.3. How to report incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.

11.4.2. Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.

11.4.3. Making sure that staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

11.4.3.1. Staff are not allowed to use their mobile phones during lessons except in emergencies.

11.4.3.2. Staff will not take pictures or recordings of students on their personal phones or cameras.

11.4.4. Record all live Teams lessons and save chat logs and Teams participants data for safeguarding.

11.4.5. Monitoring content posted on TLC platforms and services.

11.4.6. Put in place systems to limit children's exposure to the 4 key categories of risk (described above)

11.4.7. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced.

11.5. **Filters and monitoring**

11.5.1. Governing bodies and proprietors should be doing all that they reasonable can to limit children's exposure to the above risks from various IT systems. As part of this process, the Senior Leadership Team will ensure that there are appropriate filters and



monitoring in place. See *Annex 9* for the roles and responsibilities in relation to filters and monitoring.

11.5.2. Whilst considering their responsibility to safeguard and promote the welfare of children provide them with a safe environment in which to learn, TLC will consider the age range of their students, the number of students, how often they access the IT system and the proportionality of costs vs. risks.

11.5.3. The [UK Safer Internet Centre](#) has published guidance as to what “appropriate” might look like. Appropriate filtering and monitoring guidance on e-security is available from the National Education Network-NEN.

#### *Use of Mobile Technology*

11.5.4. Many children have unlimited and unrestricted access to the internet and TLC will carefully consider how this is managed whilst working with a commissioned student.

11.5.5. Whilst it is essential that we ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

11.5.6. It is generally suggested, that due to the intensive nature of our delivery models, and the nature of the students we are commissioned to work with, students will not be allowed unsupervised access to ICT or mobile technology whilst on commission with TLC.

11.5.7. TLC works with external partners to review data and information security which incorporates online safety during intervention work. Government guidance around filtering and monitoring provides information for schools and colleges: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>.

11.5.8. Where devices are owned and managed by TLC, we ensure that software is updated regularly, age-appropriate filters are in place and also known websites that may look to exploit vulnerable young people to engage in abusive or extremist behaviours are blocked. We are currently looking to embed a wide-ranging digital strategy which will be informed in part by this guidance from the [UK Safer Internet Centre](#).

11.6. This section summarises our approach to online safety and mobile phone use. For comprehensive details about our policy on online safety and the use of mobile phones, please refer to our [Online Safety Policy](#).

## **12. Social Media**

Social media is a broad term for any kind of online platform which enables people to directly interact with each other. It allows people to socialise share information, ideas and views. Examples of social media include online blogs, Facebook, LinkedIn, Twitter, Snapchat, Instagram, Whatsapp, TikTok and YouTube.

TLC staff and tutors should be aware that content uploaded to social media is not private. Even if you restrict an account to private viewing or ‘friends’, there is still capacity any content to be re-posted or distributed beyond the intended recipients. Therefore, staff and tutors using social media should conduct themselves with professionalism and respect.

Staff and tutors should not upload any content on to social media sites that:

- is confidential to TLC, its staff, tutors, students or any other member who engages with TLC;
- amounts to bullying;
- amounts to unlawful discrimination, harassment or victimisation;
- brings TLC in any way into disrepute;

- contains lewd, sexually explicit, threatening or similarly inappropriate or offensive comments, images or video clips;
- undermines the reputation of schools and/or individuals;
- is defamatory or knowingly false;
- breaches copyright law; or
- is in any other way unlawful.

Staff and tutors on the platform should be aware of professional and social boundaries and should not accept or invite 'friend' requests from students or ex-students under the age of 18, or from parents on their personal social media accounts such as Facebook. All communication with parents should be through TLC's communication platforms, devices or accounts.

Any content or online activity which raises a safeguarding concern must be reported to TLC via [Reporting Safeguarding Concerns Form](#).

Following any report of inappropriate use of social media, TLC will conduct an investigation, this may lead to disciplinary action, removal from TLC and any other appropriate response.

### **13. Students with Special Education Needs**

13.1. TLC recognises the importance of safeguarding all students including those with special educational needs (SEN). TLC supports its tutors with specific SEN training that all tutors must undertake. The training also includes specific guidance on safeguarding students with SEN.

13.2. TLC acknowledges that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration • these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

13.3. We offer extra pastoral support for these students. This includes:

- Providing one-to-one or one-to-two classes, where necessary
- SEN training for all tutors

13.4. Any reports of abuse involving children with SEND will therefore require close liaison with the DSL. Further information can be found in the department's:

- [SEND Code of Practice 0 to 25 years](#), and;
- [Supporting Pupils at School with Medical Conditions](#).

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS) – SENDIASS offers information, advice and support for parents and carers of children and young people with SEND.

- [Mencap](#) – Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

Tutors and TLC staff should follow the same guidance when reporting a safeguarding concern for SEN students. Even when there is a low-level concern, tutors and staff should not hesitate to report anything, especially when it comes to safeguarding students. Again if you are unsure of any concerns, please speak to any of TLC's safeguarding staff.

#### **14. Students with mental health difficulties**

14.1. We recognise that safeguarding is part of our whole-organisation approach to mental health and wellbeing. We acknowledge the links present between mental health difficulties and safeguarding which mean that:

14.1.1. Students with mental health difficulties may be at a higher risk of safeguarding concerns.

14.1.2. Abuse, neglect and other traumatic and adverse childhood experiences can have a lasting impact throughout childhood, adolescence and into adulthood; so it is essential to be aware of how these experiences can impact students' mental health, behaviour and wellbeing.

14.2. Furthermore, we acknowledge that some groups of students are at a higher risk of mental health difficulties, such as:

14.2.1. Students with SEND

14.2.2. Looked-after and adopted children

14.2.3. Children with a social worker

14.2.4. Children in care or who have left care

14.2.5. Children affected by socio-economic disadvantage

14.2.6. Those exposed to contextual safeguarding risks, e.g., child sexual exploitation (CSE) and children criminal exploitation (CCE).

14.3. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the guidelines in this policy, speaking to the DSL or a deputy. Further details on supporting students with mental health can be found in *Annex 6*.

#### **15. Students with a social worker**

15.1. Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

15.2. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

15.3. Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

15.3.1. Responding to unauthorised absence or missing education where there are known safeguarding risks.

15.3.2. The provision of pastoral and/or academic support.

#### **16. Looked-after and previously looked-after children**

16.1. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that schools inform us of the following, where relevant:

16.1.1. Relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

16.1.2. Details of children's social workers and relevant school head.

16.2. Our DSL will work to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

## 17. Safeguarding Procedures – What to do in the event of a safeguarding concern

Please see Annex 4 for indicators of abuse and neglect. All staff must follow the procedures set out below in the event of a safeguarding issue. Please note: in this and subsequent sections, any reference to DSL means "the Designated Safeguarding Lead (or deputies)".

### 17.1. Reporting

17.1.1. Staff and tutors working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff and tutors should always act in the best interests of the child.

17.1.2. If staff or tutors have any concerns about a child's welfare, they should act on them immediately and follow TLC's Safeguarding Procedures and speak to the DSL and/or deputies. Options will then include:

- Monitoring the concern;
- Managing any support for the child internally by communicating with their school's DSL;
- making a referral to statutory services for example as the child could be in need, is in need, or is suffering, or likely to suffer harm.

17.1.3. The DSL (or deputy) should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff or tutors should consider speaking to a senior member of staff or the Managing Director and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the DSL (or deputies) as soon as is practically possible.

17.1.4. Staff and tutors should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers supports staff who have to make decisions about sharing information.](#) This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR).

17.1.5. DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL or deputies. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

17.1.6. Fundamental to any safeguarding concern is the timely reporting of any safeguarding incidents to TLC swiftly, so that the concern can be investigated fully and prevent any risk of harm or further harm. All safeguarding concerns will be investigated within 24 hours of TLC receiving a report.

17.1.7. Safeguarding concerns should be reported via the [Reporting Safeguarding Concern Form](#) or if you would prefer, please email [safeguarding@learnerscollective.com](mailto:safeguarding@learnerscollective.com). The email is monitored at all times by TLC's Safeguarding Team. Or by contacting the DSL or deputies.

17.1.8. When reporting a concern via the form or via email, it is important that you follow the guidance below:

- Only write about one child on each form.
- Remember that concern forms may be used in police investigations, court cases and inquests as evidence.
- Reports should be objective and detailed.
- If you cannot access a copy of the TLC Reporting Safeguarding Concern Form, then contact any member of the TLC Safeguarding Team who will assist you with making a report.
- Please alert the team as soon as possible. It can take several hours to deal with even urgent concerns and the earlier we start the better.
- No further engagement by the tutor with parents, students or carers about the incident should take place at this stage. The tutor should await further instructions by TLC.

## 17.2. **If a child is suffering or likely to suffer harm, or is in immediate danger**

17.2.1. Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or is likely to suffer from harm, or is in immediate danger.

17.2.2. Tell the DSL as soon as possible if you make the referral directly (see Clause 17.1). The DSL will inform the relevant child's school DSL, who will follow their local procedure as put in place by their three safeguarding partners.

## 17.3. **If a child makes a disclosure to you**

17.3.1. If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions. Allow the child to lead the conversation and do not 'put words in their mouths'.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. You can use the same language and terms or include quote marks to record the child's account. Stick to the facts, and do not put your own judgement on it and do not include your opinions.
- Submit the report in accordance with the procedures laid out in Clause 17.1.

17.3.2. If the child's school is involved in tuition provision, the DSL will immediately pass on information to the school's DSL or child protection lead. The school shall follow their school procedure for reporting to the Local Authority or other relevant authorities. TLC shall support the school with any action that the school deems appropriate and shall undertake reasonable endeavours to provide the school with any assistance or documents.

17.3.3. If the students' school is not involved in tuition provision, the DSL will review all information received from tutors or staff members and make a decision on the most suitable response. Their response may include passing on information to the police,

child protective services, the NSPCC and/or, if it will not put the child in danger, the child's parents, carers or guardians.

17.3.4. TLC shall not, under any circumstances, undertake any independent investigation or questioning unless or until TLC is given authorisation by the school or the authorities. Following authorisation, TLC may independently follow up on allegations.

#### **17.4. If you discover that FGM has taken place or a student is at risk of FGM**

17.4.1. Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs" (see *Annex 4*),

17.4.2. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

17.4.3. Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in *Annex 5*.

17.4.4. If staff suspect a child is at risk of undergoing or has undergone FGM, they should follow the mandatory FGM reporting processes (see diagrams in *Annex 7*).

17.4.5. Any staff member who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police. This is a mandatory statutory duty breach for which staff will receive disciplinary sanctions.

17.4.6. Unless they have been specifically told not to disclose, they should discuss the case with the DSL.

17.4.7. If in Wales, staff who identify cases of FGM need to make a report to both the police and the relevant local authority.

17.4.8. Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL immediately. The DSL will inform the school's DSL and/or social care lead who will follow their local safeguarding procedures.

17.4.9. The duty mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

17.4.10. The DSL shall contact the police on 999 if there is an immediate risk, otherwise 101, inform the child's school's DSL and report it to the children's social care team at their local council. The school will also follow their local safeguarding procedures.

#### **17.5. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer harm, or is in immediate danger)**

17.5.1. Where possible, speak to the DSL first to agree a course of action.

17.5.2. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

17.5.3. Make a referral to the relevant local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

### ***Early help***

17.5.4. All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Staff should report all students who may benefit from early help to the DSL.

17.5.5. If early help is appropriate, the DSL will lead on liaising with other TLC team members, other agencies, such as the child's school, and setting up an inter-agency assessment as appropriate.

17.5.6. Staff may be required to support other TLC team members, other agencies and professionals in an early help assessment. Any such cases will be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

### ***Referral***

17.5.7. If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

17.5.8. If you make a referral directly (see Clause 17.2), you must tell the DSL as soon as possible.

17.5.9. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

17.5.10. If the child's situation does not seem to be improving after the referral, the DSL must follow up with the child's school, who shall follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

## **17.6. If you have concerns about extremism**

17.6.1. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. The DSL will also liaise with the child's school's DSL.

17.6.2. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek relevant advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

17.6.3. Where there is a concern, the DSL and the child's school DSL will consider the level of risk together and decide which agency to make a referral to. This could include

[Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

17.6.4. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which all staff can call to raise concerns about extremism with respect to a student. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

17.6.5. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that maybe terrorist related.

#### 17.7. **If you have a mental health concern**

17.7.1. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

17.7.2. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

17.7.3. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Clause 17.2.

17.7.4. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree on a course of action.

17.7.5. For more information regarding mental health and wellbeing, refer to *Annex 6*.

#### 17.8. **Concerns about a staff member**

17.8.1. Concerns could include allegations that a current or former staff member, at any level of seniority, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of work.

17.8.2. If you have concerns about a member of staff, or an allegation is made about a member of staff posing a risk of harm to children, speak to the DSL. If the concerns/allegations are about the DSL, speak to a member of the Senior Leadership Team or the Managing Director.

17.8.3. TLC will always deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. We will deal with all allegations as quickly and effectively as possible.

17.8.4. A 'case manager' will lead any investigation. This will be the DSL or a member of the Senior Leadership Team where the DSL is the subject of the allegation. The case manager will be identified at the earliest opportunity.

17.8.5. Our procedures for dealing with allegations will be applied with common sense and judgement.



17.8.6. If you believe there is a conflict of interest in reporting a concern or allegation about a member of staff to the Senior Leadership Team, report it directly to the relevant local authority designated officer (LADO).

17.8.7. The member of the Senior Leadership Team will then follow the procedures set out in appendix 8, if appropriate.

#### 17.9. Allegations of abuse made against other students.

17.9.1. We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. All staff should report any concern, and it is essential not to establish a hierarchy of concerns and dismiss harmful behaviours as low level or explain them away as “banter”. All low-level concerns should be reported to the DSL in line with reporting procedure, taken seriously and acted on, no matter how minor the behaviour may seem.

17.9.2. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

17.9.3. Some cases of students hurting other students will be dealt with under the TLC behaviour policy, but this Child Protection and Safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put other students at risk.
- Is violent.
- Involves students being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

17.9.4. See *Annex 5* for more information about child-on-child abuse.

#### ***Procedures for dealing with allegations of child-on-child abuse***

17.9.5. TLC is committed to working with other agencies, such as schools, the police, local authorities, the NSPCC and other agencies. Children’s parents, carers and guardians may also be informed if this does not pose harm to the children involved.

17.9.6. If a child makes an allegation of abuse against another child:

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will assess the situation and make a judgement on the most suitable line of response.
- Where deemed appropriate, the DSL will contact the child’s school and/or local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- Where deemed appropriate, the school’s DSL will put a personalised safeguarding risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- Where deemed appropriate, the school’s DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- Where deemed appropriate, the DSL will support the school with any action that the school deems appropriate and shall undertake reasonable endeavours to provide the school with any assistance or documents.

### ***Creating a supportive environment and minimising the risk of child-on-child abuse***

17.9.7. We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

17.9.8. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders.
- Help to educate students about appropriate behaviour and consent.
- Ensure students are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a student harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns

### **17.10. Sharing of nudes or semi-nudes (‘sexting’).**

#### ***Your responsibilities when responding to an incident***

17.10.1. If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

17.10.2. You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility).
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

17.10.3. You should explain that you need to report the incident, and reassure the student(s) that they will receive support from TLC's DSL and, where appropriate, from other agencies. If appropriate, the DSL will inform other agencies, such as the child's school, the police, the NSPCC, the child's local authority, who can provide assistance to the child.

#### ***Initial review meeting***

17.10.4. Following a report of an incident, the DSL will hold an initial review meeting with relevant staff and members, this may include the school's DSL lead and the member of staff who reported the incident. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to the student(s).
- If a referral needs to be made to the police and children's social care.
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed).
- What further information is required to decide on the best response.
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the students involved which would influence the assessment of risk.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the students involved (in most cases parents should be involved).

17.10.5. The DSL or the school's DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any student in the images or videos is under 13.
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

17.10.6. If none of the above apply then the DSL, in consultation with the school's DSL and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

#### ***Further review by DSL***

17.10.7. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

17.10.8. If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately. The school's DSL will be informed at each step.

### ***Informing parents***

17.10.9. The DSL will inform the child's school immediately who shall inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

### ***Referring to the police***

17.10.10. If it is necessary to refer an incident to the police, this will be done through dialling 101 or contacting the local neighbourhood police of the child's school if known.

## **17.11. Reporting systems for our students**

17.11.1. If a student is making a disclosure, you should:

- Remain invariably calm.
- Reassure the student that that they are doing the right thing.
- Offer sympathy and comfort to the student or other party, and listen to them attentively, asking open questions in the process.

17.11.2. Under no circumstances should you:

- Make any assumptions or judgements about the student or any other party involved in the safeguarding issue.
- Lead the student or other party into answering in a certain way or pressuring them for more information than they are comfortable disclosing.
- Take actions into your own hands or encourage others to take any actions, unless strictly necessary when there is immediate risk of harm for any of the parties involved.
- Discuss any disclosures made by students or other parties with anyone outside of the TLC Safeguarding Team, unless required to do so by protection agencies or authorities.

17.11.3. Students should immediately contact their school or TLC's DSL if they have any concerns about a tutor or member of staff and immediately discontinue any course of tuition. Students are provided with full details and information on how to report a member of staff or tutor on their information packs when commencing tuition with TLC.

## **17.12. Disclosure and procedure for handling a safeguarding incident**

17.12.1. After being notified of a child protection or safeguarding incident, the Safeguarding Team will consider the information, if necessary, taking advice, and depending on the level of the concern, will take the following steps:

- Speak individually with all parties connected to the incident.
- The DSL of TLC will speak to the school's Designated Safeguarding Lead.
- Produce a written record of these conversations, including providing relevant dates and times.

17.12.2. The Designated Safeguarding Lead will establish the level of concern and the necessary next steps required, this will include:

- Keeping detailed records of the concern, continuous monitoring maybe necessary in some circumstances.
- If relevant, contact social services (in the event that the student has a social worker) and the Local Authority department and if it is a referred student and/or the school's Designated Safeguarding Lead, also contact the referring borough organisation, to discuss a plan of action.

- Produce a written report of the incident and provide it to the relevant department in the Local Authority and/or the school's Designated Safeguarding Lead.
- Follow all further guidance received from the relevant department of the Local Authority and/or the school's Designated Safeguarding Lead.

**Where a child is suffering, or is likely to suffer from harm, it is important that referrals are made immediately and contact the police if necessary.**

17.12.3. Full details on handling a safeguarding incident can be found in TLC's Safeguarding Strategy.

### **17.13. Emergency responses**

17.13.1. Where a child is identified at immediate risk of harm then tutor will immediately contact the Police for the areas where the risk is located using 999. This is especially important when the child is being tutored at home and there is no independent school teacher present.

17.13.2. Within one working day of a referral being made, the relevant Children's Social Care Team should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required.

17.13.3. Where tutors are delivering tuition to children and young people in a school or college, TLC must inform the school's Designated Safeguarding Lead of any safeguarding concern.

### **17.14. DBS Requirement and Duty to Report**

17.14.1. TLC is under a legal duty to report any concerns about unsafe practice by any of its directors, staff or tutors to the Disclosure and Barring Service (DBS). This applies where an individual has engaged in conduct that has either harmed or is likely to harm a child or student; or if a person otherwise poses a risk of harm to a child (KCSiE 2023, part 4, para 402).

17.14.2. If at any time TLC dismisses a director, member of staff or tutor due to relevant conduct, risk of harm or receiving a caution or conviction for a relevant offence (or the person has resigned or left that post in circumstances where they may have been removed), then a referral to the Disclosure and Barring Service will still be made.

### **17.15. Learning Lessons and Continual Improvement**

17.15.1. TLC are committed to learning any lessons, alongside support and guidance with the Local Authority Designated Officer to determine whether there are any improvements to be made to our procedures, or to help prevent similar events in the future. This includes lessons learned about suspension, reinstatement after suspension (KCSiE 2023, part 4, para 421-422).

### **17.16. Low-level Concerns (KCSiE 2023, part 4, para 425-446)**

17.16.1. We aim to create a culture where all concerns about all members of TLC are recorded and dealt with promptly and appropriately. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of TLC may have acted in a way that:

- is inconsistent with the staff or tutor code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

- 17.16.2. Examples of such behaviour could include, but are not limited to:
- Being over friendly with children.
  - Having favourites.
  - Taking photographs of children on their mobile phone, contrary to school policy.
  - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or;
  - Humiliating children.
- 17.16.3. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
- 17.16.4. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. If you are unsure of any concerns, no matter how small, please speak to the Designated Safeguarding Lead or use the Reporting a Safeguarding Concern Form. Ensuring low-level concerns are dealt with effectively should also protect those working in or on behalf TLC from becoming the subject of potential false low-level concerns or misunderstandings.
- 17.16.5. If implemented correctly this should:
- Enable TLC to identify inappropriate, problematic or concerning behaviour early.
  - Minimise the risk of abuse, and;
  - Ensure that adults working in or on behalf TLC are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.
- 17.16.6. In order to achieve the purpose of reporting low-level concerns, TLC will ensure that:
- Staff and tutors are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others.
  - Empowering staff to share any low-level safeguarding concerns (see below).
  - Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
  - Handling and responding to such concerns sensitively and proportionately when they are raised, and;
  - Helping identify any weakness in the school or colleges safeguarding system.
- 17.16.7. **Sharing low-level concerns:** following the report of a low-level concern, the Managing Director will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the Managing Director 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.
- 17.16.8. TLC endeavours to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 17.16.9. **Recording low-level concerns:** all low-level concerns are recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. TLC will keep these records securely and

comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

17.16.10. Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

17.16.11. TLC will also consider whether there are wider cultural issues within the organisation 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.

17.16.12. TLC will retain information on such individuals until they leave the organisation.

17.16.13. 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.

17.16.14. When responding to low-level concerns, TLC will:

- Collect as much evidence as possible.
- Speak directly to the person who raised the concern, unless it has been raised anonymously, and;
- Speak to the individual involved and any witnesses.
- The information collected will help categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for their decisions and action taken.

## 18. Information sharing

18.1. 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. TLC has clear powers to share, hold and use information for these purposes.

18.1.1. The DSL along with the Managing Director will make an appropriate decision in light of any safeguarding concerns and will pass on to the school's DSL and/or LADO if necessary.

18.1.2. As part of meeting a child's needs, it is important that TLC recognises the importance of information sharing between practitioners and local agencies. This includes sharing information within the organisation and with LADO.

18.1.3. TLC staff should 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 is when problems are first emerging, or where a child is already known to local authority children's social care. TLC directors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

18.1.4. TLC should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes:

- 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'.

- 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, and;
- not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious [harm test](#) is met, they must withhold providing the data in compliance with TLC's obligations under the Data Protection Act 2018 and the UK GDPR.

18.1.5. 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. Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner's Office \(ICO\)](#), which includes information about your obligations and how to comply, including protecting personal information, [Sharing data to safeguard children FAQs](#) and providing access to official information
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

18.1.6. Child protection concerns should be shared with the school's DSL as soon as possible. The DSL should ensure secure transit, and confirmation of receipt should be obtained.

## 19. Prevent Duty

19.1. TLC has a duty under section 26 of the Counter-Terrorism and Security Act 2015, and have due regard to the need to prevent people from being drawn into terrorism. We deliver compulsory PREVENT training as part of our safeguarding training to all our tutors and staff, refreshed no less than once a year.

19.2. Where students have been identified as at risk of being radicalised or have been radicalised. The DSL, with the school's DSL will make a referral to the Channel Programme.

## 20. Record Keeping

20.1. We will hold records in line with our records retention schedule in our Records Management, Retention and Disposal Policy.

20.2. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by TLC. Information should be kept confidential and stored securely.

20.3. Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved, and;



- A note of any action taken, decisions reached and the outcome. If in doubt about recording requirements, staff should discuss with the DSL or deputies.

- 20.4. Concerns and referrals will be kept in a separate child protection file for each child.
- 20.5. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 20.6. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left TLC.
- 20.7. Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.
- 20.8. Our safeguarding records are kept electronically on TLC's servers. We keep these confidential and separate from student records. We retain and dispose of information as per our Records Management, Retention and Disposal Policy. We share information on a need-to-know basis and only with relevant schools, other safeguarding partners and agencies.

## **21. Safeguarding Governance**

TLC is committed to providing support to all those involved with the organisation. A clear structure of safeguarding accountability supports everyone to understand their individual and collective responsibilities for safeguarding children and young people. TLC will ensure it has arrangements in place to fulfil its commitment and duty to safeguard students, children and young people in accordance with legislation and statutory guidance.

### **21.1. Managing Director and Executive Suite**

21.1.1. The Managing Director and Executive Suite play a vital role in ensuring that they are legally compliant in order to manage the organisation's resources effectively and provide a long-term vision and protect the organisation's reputation and values.

21.1.2. In order to fulfil these responsibilities, the Managing Director and Executive Suite may delegate some or all of these responsibilities to individual Executive Officers or members of the leadership team.

21.1.3. The Managing Director and Executive Suite are responsible for:

- Approving all safeguarding policies and supporting procedures.
- Ensuring adequate resources are available for effective safeguarding practices and training.
- Ensuring effective reporting and auditing processes are in place and that the same are regularly reviewed.
- Receiving regular safeguarding reports from the safeguarding team.
- Developing a culture within the organisation that promotes effective safeguarding practices.
- Ensuring safeguarding is integral to every aspect of the organisation.

### **21.2. TLC Leadership Team**

21.2.1. The Leadership Team will ensure our commitment to safeguarding forms part of the delivery of all its services, activities and contracts. They will assist in the safer recruitment and selection of staff and tutors.

21.2.2. The Leadership Team will ensure that:

- Safeguarding and a culture of vigilance is promoted and embedded in all areas of the organisation including with the organisation's partners and contractors.
- Clear and effective communication pathways for safeguarding are shared with all staff, tutors and customers.

- Proposed changes to safeguarding policies and procedures are presented to the Managing Director and Executive Suite in accordance with the agreed cycle of policy review.
- The named Designated Safeguarding Lead and Deputy Safeguarding Officers have sufficient resources in order that they may discharge their functions detailed below.
- Safer recruitment and selection practices of staff and tutors are implemented in accordance with TLC's Safer Recruitment Policy.
- The coordination and investigation of concerns and allegations against staff members or tutors.

## **22. Training**

All staff members undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand TLC's safeguarding procedures and their responsibilities, and can identify and intervene in safeguarding incidents.

This training is regularly reviewed updated every 6 months and will always:

- Be considered a core part of TLC's training and whole safeguarding approach.
- Take into account relevant advice from the 3 safeguarding partners.
- Support tutors to teach in line with TLC's core values.
- Support tutors to manage behaviour effectively to ensure a good and safe environment.
- Ensure that staff have a clear understanding of the needs of all students

All staff, who work directly with or may come into contact with children, will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

All members of the Senior Leadership Team receive training about safeguarding to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. As members of the Senior Leadership Team may be required to act as the 'case manager' in the event that an allegation of abuse is made against the DSL or other staff, they receive training in managing allegations for this purpose.

Safer Recruitment –all staff conducting any interviews or meetings will have undertaken safeguarding and safer recruitment training, according to TLC's Safer Recruitment Policy and in line with statutory guidance and Keeping Children Safe in Education. All staff who are privy to sensitive or personal information about children's families receive support and training on how to promote the interests of children, protect confidential information and undertake discussions about sensitive issues.

TLC's Safeguarding Training includes:

- An interactive live, online training session conducted by our in-house safeguarding specialist, including a session on online safety and Prevent training.
- An Individual Safeguarding and Child Protection Training Guide.
- External safeguarding training and multiple choice Q&A assessment.
- Review training days for tutors where they can ask questions and share feedback.

All staff and tutors will undertake refresher training not less than once annually..

## **23. Complaints**

If a complaint is identified as a potential safeguarding concern, then the Safeguarding Procedures will be followed.

## 24. Quality Assurance and Review

TLC is committed to striving for excellence in the provision of all its services. We do this by actively reviewing the safeguarding systems, policies and procedures in place.

As part of our commitment to safeguarding TLC uses the recording feature on Microsoft Teams and Bramble to capture all relevant data that supports the evidencing and monitoring of compliance in safeguarding. This quality assurance mechanism is a crucial and integral part of the governance structure.

The safeguarding team will review the safeguarding policy and supporting procedures annually to ensure they continue to reflect legislation and guidance. Any amendments to the policy and supporting procedures will be submitted to the Directors for approval.

## 25. Legislation

The following legislation underpins the operations of TLC:

- Children Act 1989
- Human Rights Act 1998
- United Nations Convention on the Rights of the Child, 1991
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Forced Marriage (Civil Protection) Act 2007
- The Equality Act 2010
- Children and Families Act 2014
- Anti-Social Behaviour, Crime and Policing Act 2014
- Modern Slavery Act 2015
- Counter Terrorism and Security Act 2015
- Children and Social Work Act 2017
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Children's Code (issued under S125 DPA 2018, effective Oct 2021)

## 26. Additional Guidance

- [What to do if you're worried about a Child is being Abused, 2015](#)
- [Mandatory Reporting of Female Genital Mutilation, 2016](#)
- [Child Sexual Exploitation Guidance 2017](#)
- [Information Sharing Advice for Safeguarding Practitioners 2018](#)
- [Working Together to Safeguard Children 2018](#) places a general duty on schools to work and cooperate with other agencies to safeguard and promote the welfare of children. TLC is committed to do this by having an open, honest and transparent line of communication.
- [Guidance for Safer Working Practice for those working with children and young people in education settings, May 2019](#) this document is an update by the Safer Recruitment Consortium of a document previously published for schools by the Department for Education and Skills (DfES). It was initially issued as those working with children had expressed concern about their vulnerability and requested clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. Education staff asked for practical guidance about which behaviours constitute safe practice and which behaviours should be avoided. This safe working practice document is NOT statutory guidance from the Department for Education (DfE); it is for employers, local authorities and/or the Three Safeguarding Partners to decide whether to use this as the basis for their code of conduct. An [addendum](#) was published in response to Covid-19 in April 2020.

- [Keeping Children Safe in Education 2023 \(KCSIE\)](#) is statutory guidance issued from the Department for Education under Section 175 of the Education Act 2002. Schools, colleges and other organisations must have regard to this when carrying out their duties to safeguard and promote the wellbeing of children.
- [Sexual violence and sexual harassment between children in schools and colleges 2021](#) – the advice provided by the DfE sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred.
- [Children’s Code](#) is a statutory code of practice that articulates how online services likely to be accessed by children should comply with the UK GDPR when using children’s data. The code was prepared under S121 of the DPA 2018 and issued under S125 of DPA 2018.
- [Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, 2018](#)

## 27. Support and Resources

- Local authority children’s social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children’s social care.
- National Crime Agency’s CEOP Safety Centre: The CEOP Safety Centre aims to keep children and young people safe from online sexual abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors.
- The NSPCC provides a helpline for professionals at 0808 800 5000 and [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies).
- Support from specialist sexual violence sector organisations such as [Rape Crisis](#) or [The Survivors Trust](#).
- The Anti-Bullying Alliance has developed guidance for schools about [Sexual and sexist bullying](#).
- Online concerns can be especially complicated and support is available from:
  - The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk). The helpline provides expert advice and support for school and college staff with regard to online safety issues.
  - Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the [Internet Watch Foundation \(IWF\)](#).
  - Childline/IWF [Report Remove](#) is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online.
  - **UKCIS Sharing nudes and semi-nudes advice:** [Advice for education settings working with children and young people](#) on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information.
  - National Crime Agency’s [CEOP Education Programme](#) provides information for the children’s workforce and parents and carers on protecting children and young people from online child sexual abuse.
  - LGfL ['Undressed'](#) provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring 112 them or explaining the motives of sex offenders.

## **Annex 1**

[TLC Reporting Safeguarding Concerns Form](#)

## **Annex 2**

### **Guidance on completing the Reporting Safeguarding Concerns Form**

Fundamental to any safeguarding concern is the timely reporting of any safeguarding incidents to TLC swiftly, so that the concern can be investigated fully and prevent any risk of harm or further harm. All safeguarding concerns will be investigated within 24 hours of TLC receiving a report.

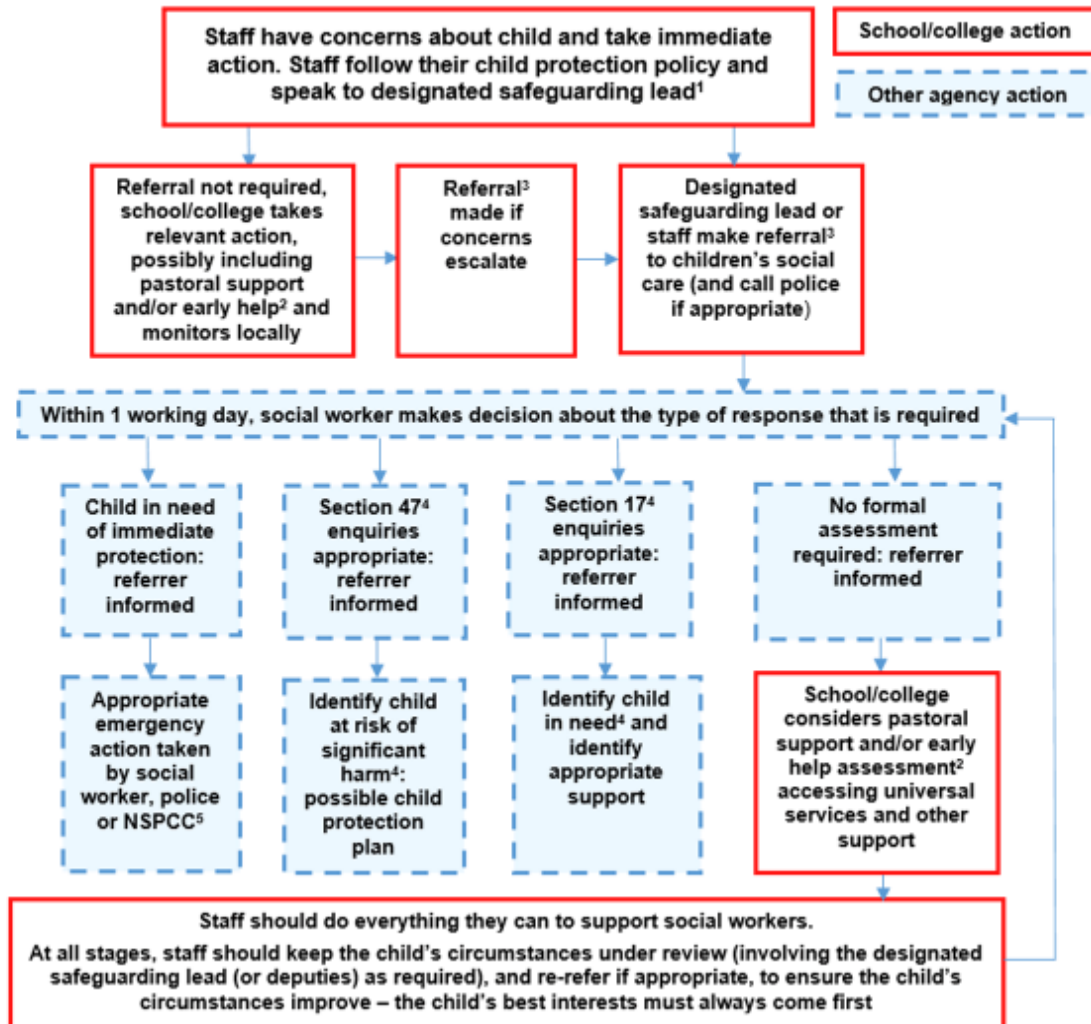
When reporting a concern via the form or via email, it is important that you follow the guidance below:

- Only write about one child on each form.
- Remember that concern forms are used in court cases and inquests as evidence.
- Reports should be objective and detailed.
- If you cannot access a copy of the TLC Reporting Safeguarding Concern Form, then contact any member of the TLC team who will assist you with making a report.
- Please alert the team as soon as possible. It can take several hours to deal with even urgent concerns and the earlier we start the better.
- No further engagement by the tutor with parents, students or carers about the incident should take place at this stage. The tutor should await further instructions by TLC.

**Annex 3**

KCSIE 2023, page 22:

**Actions where there are concerns about a child**



## **Annex 4: Types of Abuse**

### **1. Understanding Abuse.**

- 1.1. As children and young people regularly engage with TLC, especially those under the age of 18, understanding abuse and its different forms are essential to identifying potential incidents as early as possible.
- 1.2. Identifying potential incidents can protect and prevent Students from further harm, ensure that they continue to have healthy mental and physical development in a safe environment and enable students to have the best outcomes.
- 1.3. All members of the organisation should be aware of indicators of abuse and neglect through their experience and training so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead.
- 1.4. All members of the organisation 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 own experiences as harmful.

### **2. Defining abuse**

- 2.1. Keeping Children Safe in Education 2023 (KCSiE 2023), part 1, paragraph 26 defines abuse as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

2.1.1. All staff and tutors should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of TLC, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff and tutors are able to identify cases of children who may be in need of help or protection (KCSiE 2023, part 1, para 21).

2.1.2. All staff and tutors should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another. All staff and tutors, 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 can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation (KCSiE 2023, part 1, para 22-23).

2.1.3. All staff and tutors should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content (KCSiE 2023, part 1, para 24).

- 2.2. **Indicators of abuse and neglect** (KCSiE, 2023, part 1, para 27-30).

- 2.2.1. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 2.2.2. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child 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 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, although it may occur alone.
- 2.2.3. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of 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 to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). 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 (also known as child on child abuse) in education and all staff and tutors should be aware of it and adhere to this policy and procedures in dealing with it (see 2.2.5).
- 2.2.4. **Neglect:** the persistent failure to meet a child'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 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 from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 2.2.5. **Child-on-child abuse** (KCSiE 2023, part 1, para 35): Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that members of TLC including tutors recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.
- 2.2.5.1. Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);



- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse (see 2.3.12);
- 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;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, 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; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

2.2.5.2. It is crucial that all staff understand that even if there are no reports to TLC or the schools and colleges we support, it does not mean it isn't happening.

2.2.5.3. TLC has a zero-tolerance approach to abuse: it should never be passed off 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. Unfortunately, it is more likely that girls be will victims and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

2.2.5.4.

### 2.3. Other types of abuse

2.3.1. **Mental Health:** all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. TLC can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. If any staff or tutors have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to following TLC's Safeguarding Policy and Procedures, and by speaking to the Designated Safeguarding Lead or deputies (KCSIE 2023, part 1, para 45-47).

2.3.2. **Serious Violence:** all staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from their school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (KCSIE 2023, part 1, para 48).

2.3.3. **Domestic abuse:** this includes physical, sexual, emotional or psychological abuse. This may also include honour-based abuse. Children raised in households in which there is domestic violence may suffer from long-term mental health problems.

- 2.3.4. **Modern slavery:** this includes slavery, human trafficking, sexual exploitation, forced marriage, forced labour, and domestic servitude. Traffickers and slavery masters may also commit physical, sexual, emotional or psychological abuse to their victims.
- 2.3.5. **Self-neglect:** a wide array of behaviours, including neglecting to care for one's basic needs and well-being, e.g., personal hygiene, appropriate clothing, health or surroundings and includes behaviour such as hoarding.
- 2.3.6. **Online abuse:** this is any type of abuse that happens online, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, peer-to-peer pressure, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example, exchanging inappropriate content with children or persuading children to take part in sexual activity online). Being exposed to illegal or inappropriate content (e.g., pornographic material, fake news, or content that promotes racism, misogyny, self-harm, suicide, radicalism and extremism, as well as discrimination or hatred against a particular group of people, religion or belief) can also be considered online abuse.
- 2.3.7. **Grooming:** this is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know – for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed or that what has happened is abuse.
- 2.3.8. **Female Genital Mutilation (FGM):** FGM (also referred to as 'female circumcision') is a violent and abusive procedure involving alteration or partial or total removal of the external female genital organs, which is performed for non-medical reasons, e.g., control of female sexuality. It is often performed by medically unqualified individuals on young girls aged between infancy and 16 years old by the means of instruments such as knives, razor blades, glass, scalpels or scissors. FGM is recognised as a violation of the Human Rights of females (WHO, 2014), and its practice is illegal in the UK. According to the NHS (2016), approximately 66,000 girls aged 13 and under are at risk of FGM in the UK. Those with FGM may suffer from very serious long-term physical, mental and psychosexual effects.
- 2.3.9. **Bullying and cyberbullying:** deliberate persistent offensive and humiliating behaviour intended to harm, harass, intimidate or coerce another person. Bullying may come in many different forms, some of which are: physical bullying (e.g. hitting, pushing, slapping someone), verbal bullying (e.g. name calling, gossiping, threatening someone), nonverbal abuse (e.g. hand-signs), exclusion (deliberate ostracism) and cyberbullying, which is a form of bullying achieved via electronic means (e.g. abusive or threatening text messages, sharing of embarrassing images or videos, trolling, shaming someone online, exclusion from online games, chats or friendship groups, setting up hate groups about someone, sexting, pressuring someone into sharing sexual images or engaging in sexual conversations). The growing ubiquity of the internet has contributed to cyberbullying. Any type of bullying may lead to mental health problems such as depression and anxiety, having fewer friendships, being weary or suspicious of others, problems adjusting to school, and poor academic performance.
- 2.3.10. **Radicalisation:** a process by which people are encouraged to support a radical, typically fundamentalist ideology or a political or religious movement which supports terrorism and/or violent extremism. Children may be groomed online through social media or in person by family members, friends, people from the community or others who hold harmful, extreme beliefs. Children may be exposed to violent, anti-social, extremist propaganda, which can result in the development of a distorted world view in which extremist ideology seems reasonable. A common characteristic of radicalisation is that children and young people fail to recognise themselves as victims of grooming or

exploitation. Radicalisation poses a great risk to children as extremists might eventually draw them into criminal activity and expose them to significant harm. Further information about extremism and radicalisation can be found in the Department for Education's Prevent duty guidance: for England and Wales.

- 2.3.11. **Criminal exploitation and gangs:** a process by which an individual or a group targets vulnerable children to manipulate and coerce them into committing crimes. Children might become part of street gangs for whom crime and violence is integral to their identity, organised criminal gangs for whom involvement in crime is their 'occupation' and is carried out for personal gain (e.g., financial), or a type of organized crime known as 'county lines', where urban gangs exploit young people into moving drugs from a hub (a large city) into other markets in suburban areas and coastal towns by using dedicated mobile phone lines. Children as young as 12 years old have been known to be exploited for drug-moving purposes. This may also include children being trafficked away from their home area and staying in short-term private rental accommodation or the home of a drug user.
- 2.3.12. **Sexual Harassment between children and other sexual violence:** TLC are committed to a zero-tolerance approach to sexual violence and sexual harm; it is never acceptable and will not be tolerated. Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into further education. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable (KCSiE 2023, part 5, para 447). Child on child sexual violence can happen both inside and outside of education settings. For the purposes of this policy and procedures when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 specifically: rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent (KCSiE 2023 part 5, para 450). Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside education settings. Child on child sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated degraded or humiliated and/or create a hostile, offensive or sexualised environment. (Sexual violence and sexual harassment between children in schools and colleges, (KCSiE 2023, part 5, para 451-3).
- 2.3.13. **Child Criminal and Sexual Exploitation (CSE and CCE):** both are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or 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. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation (KCSiE 2023, part 1, para 36).
- 2.3.13.1. **Child Criminal Exploitation (CCE):** some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same,

however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation (KCSiE 2023, part 1, para 37-39).

2.3.13.2. **Child Sexual Exploitation (CSE):** a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship (KCSiE 2023, part 1, para 40-42).

2.3.14. **Harmful Sexual Behaviour:** children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support (KCSiE 2023, part 5, para 454-457)

2.3.15. **Other Significant Harm:** the definition of significant harm is not prescriptive. The interpretation will depend largely on professional judgement, based on the known facts. It can include inappropriate touching, an assault, or a series of compounding events e.g., bullying. Other factors to be considered include the age and vulnerability of the child, the degree of force used, the frequency of the harm, the nature of the harm in terms of ill treatment, and the impact on the child's health and development. **Annexes A & B of KCSiE 2023 contains important additional information about specific forms of abuse and safeguarding issues. TLC strongly recommends all members of the organisation and its tutors to read the annexes in conjunction with this Policy and Procedures.**

2.3.16. **Early Help:** any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from care or from home.
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Has a family member in prison, or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing alcohol and other drugs themselves.
- Has returned home to their family from care.
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child, or;

- Is persistently absent from education, including persistent absences for part of the school day.

## **Annex 5: Specific Safeguarding Issues**

This annex is mostly based on the advice in Keeping Children Safe in Education (KSCIE). For further information on specific safeguarding issues, please refer to the latest version of KSCIE.

### **Children absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important that TLC's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

We have taken best practice examples from government guidance: [Children Missing Education](#) and [Missing Children and Adults Strategy](#)

#### *Safeguarding Concerns*

Non-attendance to sessions may be a warning sign of safeguarding concerns such as neglect, abuse or exploitation. Where we are unable to physically see or speak with a student for two consecutive sessions, then a safeguarding concern should be raised unless we have prior information from a commissioner or appropriate person (e.g youth justice, CAMHS professional) confirming this would be unnecessary.

#### *Parental Supervision/Engagement*

Where we can ascertain that non-engagement is due to parental engagement (not ensuring child is ready for sessions, actively promoting the benefits of education etc) and we do not feel that this is a safeguarding concern the following process would be followed:

1. The DSL is to report the non-engagement and attendance to the School's DSL
2. Where advised, we will also reach out to the relevant Children Missing Education (CME) officer in the Local Authority.
3. We will work with parents/carers to help promote positive modelling of the tuition.

#### *Further information and support*

- Guidance on school attendance [Working together to improve school attendance](#) including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).
- Further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#).
- General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).

### **Domestic abuse**

The Domestic Abuse Act 2021 recognises children as victims of domestic abuse in their own right if they see, hear or experience the effects of abuse. Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include:

- Intimate partner violence
- Abuse by family members
- Teenage relationship abuse.
- Child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the child's school (usually the DSL) before the child or children arrive at school the following day. The school's DSL will provide support according to the child's needs and update records about their circumstances. They may choose to inform TLC where deemed necessary.

### **Serious Violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see below for CCE and CSE))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male.
- Having been frequently absent or permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL, who shall inform the child's school and decide any next steps.

### **So-called 'honour-based' violence (including FGM and forced marriage)**

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff or tutors have a concern, they will speak to the DSL, who will take the necessary steps, including informing the school and/or the police.

#### ***FGM***

The DSL will ensure that staff are aware of the signs of HBV including FGM and have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Section 17.4 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM. Indicators that FGM has already occurred include:

- A student confiding to a member of staff or tutor that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.

- A family/student already being known to social services in relation to other safeguarding issue.

TLC recognises that girl who has undergone FGM may:

- Having difficulty walking, sitting or standing, or generally looking uncomfortable.
- Finding it hard to sit still for long periods of time (where this was not a problem previously).
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE.
- Being repeatedly absent from school, or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

The victim herself may:

- Have a mother, older sibling or cousin who has undergone FGM.
- Have limited level of integration within UK society.
- Confide to a member of staff or tutor that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talk about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period.
- Request help from a teacher/tutor or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talk about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
- Be unexpectedly absent from school.
- Have sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive. If for any reason a member of staff or tutor suspects that a girl may have undergone, or at risk of undergoing FGM, they should contact the DSL or police in an emergency.

### ***Forced marriage***

Forcing a person into marriage is a crime. 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. Staff will be aware of the indicators of Forced Marriage. TLC are aware of the 'one chance' rule, i.e. TLC may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the DSL as soon as possible who will then decide the next steps including informing the school's DSL, who may:

- Speak to the student about the concerns in a secure and private place.



- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 [orfmfu@fco.gov.uk](mailto:orfmfu@fco.gov.uk)
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

## Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- Extremism - is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Terrorism - is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. We believe we have a duty to prevent children from being drawn into terrorism.

The DSL has undertaken Prevent awareness training and ensures that staff and Tutors have also undertaken the Prevent awareness course provided by the government. We continually assess the risk of children at TLC being drawn into terrorism. This risk assessment is a live document and updated based on discussion with partner schools who have an understanding of the potential risk in their local area, in collaboration with their local safeguarding partners and local police force. We ensure that students are familiar with the online safety policy, and are equipped to stay safe in school, at home and online.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. The government website [Educate Against Hate](#) say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, children who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 17.6 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried. Further information on our measures to prevent radicalisation are set out in other policies and procedures, including online safety policy.

## **Child-on-Child abuse.**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence), especially towards girls.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- 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.
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 17.9 of this policy, as appropriate.

## **Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. If a victim reports an incident, it is essential that staff and tutors make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk. Staff and tutors should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff or tutors have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 17.5 of this policy, as appropriate.

## **Harmful sexual behaviour**

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB). Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare and education. The school DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). TLC staff are trained to recognise signs that a child is homeless or at risk of becoming homeless.

The DSL will raise concerns with the school where concerns are raised by a member of staff. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children’s social care and the police in emergency situations.

## **Child Criminal exploitation (CCE)**

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. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online (see examples in Annex 4).

If a member of staff or tutor suspects CCE, they will:

- Contact the safeguarding team with any concerns immediately.
- The DSL will inform the school’s DSL, who will trigger the local safeguarding procedures, including a referral to the local authority’s children’s social care team and the police, if appropriate.

## **Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into 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.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit videos and/or images of themselves, have sexual conversations by text, or take part in sexual activities using a camera. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they must:

- Inform the DSL as soon as they have any suspicions.
- The DSL will inform the school’s DSL as part of TLC’s Safeguarding procedures.
- The school shall follow their local safeguarding procedures, including a referral to the local authority’s children’s social care team and the police, if appropriate.

Indicators of sexual exploitation can also be indicators of CCE and can include a child:

- 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 or becoming pregnant.
- Displaying inappropriate sexualised behaviour.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and/or alcohol.
- Going missing for periods of time, or regularly coming home late.
- Regularly missing school or education, or not taking part in education.

## **Annex 6: Mental health and wellbeing policy**

### **Statement on mental health and wellbeing**

TLC is committed to supporting the emotional and mental health and wellbeing of our students and staff. We have a positive and nurturing approach embedded across our organisation intended to promote empathy and resilience. We understand that stressful and worrying situations are a part of all our lives and that stressors can affect us in different ways. We are committed to focusing on the individual and being vigilant to individuals coping with stressors, responding where appropriate to support mental health and wellbeing.

### **Our core principles for mental health and wellbeing**

It is our belief that promoting wellbeing and positive mental health is a key part of our work to educate and develop children and young people.

TLC's core principles for promoting wellbeing and positive mental health are:

- Nurturing positive qualities, such as empathy, optimism, forgiveness and compassion and providing opportunities for students to use them within tuition sessions.
- Recognising and reinforcing qualities that are key to resilience (emotional resilience, mental resilience and academic resilience).
- Avoiding focus on failure and negative behaviours, instead taking a positive first response (including positive reinforcement, praise and reward) to misbehaviour.
- Teaching by example and consistently supporting our staff members.
- Promoting feelings of competency and self-esteem so that students believe in their ability to achieve their goals in sessions and across courses
- Setting and communicating realistic and achievable expectations and goals for students.
- Ensuring that students know and feel able to reach out for help when needed.

To support these core principles, TLC has implemented:

- Staff training in promoting wellbeing and positive mental health in tuition sessions, and in identifying and responding to mental health concerns and specific conditions.
- Collaboration with parents regarding any concerns and actions (except in certain safeguarding circumstances where we adhere to our procedures to keep students safe).
- Liaison with external agencies, such as students' schools, Children and Young People's Mental Health Services (CYPMHS), and other services to report our concerns and seek additional support for students where appropriate.

Please refer to our Behaviour Policy for further information on how we take account of mental health in relation to misbehaviour and classroom management.

### **Risk Factors**

In supporting the mental health and wellbeing of students, we recognise the complex interplay between risk factors and key protective factors which promote resilience. There are a number of risk factors that may increase the prevalence of mental health difficulties and conditions and which our staff are aware of.

These include some groups of students, such as:

- Students with SEND
- Looked-after and adopted children
- Children in care or who have left care
- Children affected by socio-economic disadvantage
- Those exposed to contextual safeguarding risks, e.g., adverse childhood experiences (ACEs), child sexual exploitation (CSE) and child criminal exploitation (CCE).

Additional risk factors and characteristics include:

- Academic failure
- Low self-esteem
- Communication difficulties
- Bullying
- Discrimination
- Peer pressure
- Poor student/teacher relationships

### **Identifying needs and warning signs**

As our Behaviour Policy states, TLC recognises that changes in a student's behaviour or emotional state may be an indication of an underlying mental health difficulty. These may present as:

- Changes in their emotional state, e.g., becoming withdrawn, fearful and having low self-esteem.
- Changes in behaviour e.g., becoming challenging and oppositional, displaying aggression or physical symptoms, which may present as distractions to classmates.
- Changes in interpersonal behaviour, e.g., excessive clinginess, being coercive and controlling, failing to understand and recognise emotions.

All staff are trained in identifying and responding to mental health concerns and specific conditions. We will always take a students' mental health and wellbeing into consideration when responding to misbehaviour. Careful examination will be made to determine if mental health difficulties are contributing to behaviour difficulties and withdrawing students permanently from tuition remains a last resort.

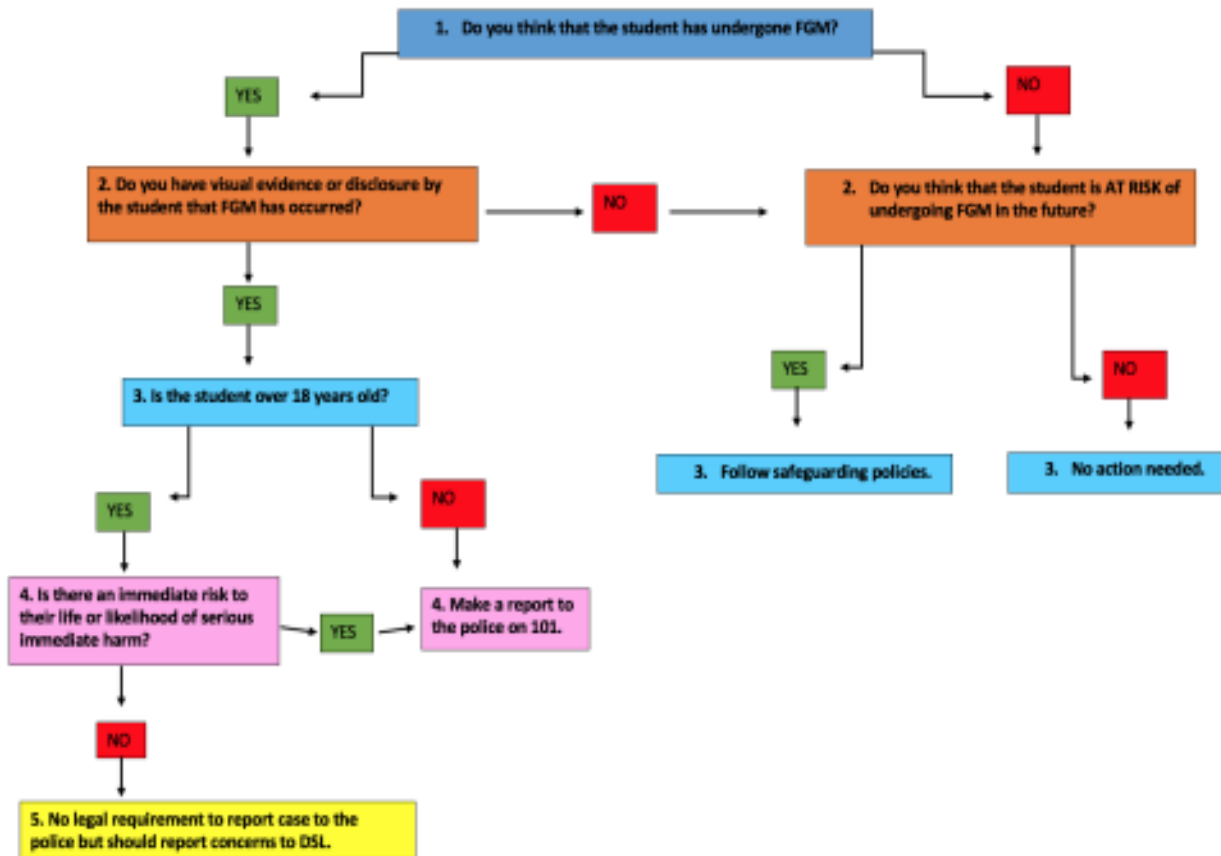
All staff receive training on recognising mental health difficulties and identifying warning signs and concerns. These warning signs should always be taken seriously, and staff observing any of these warning signs should communicate their concerns with the Designated Safeguarding Lead.

Possible warning signs include:

- Changes in emotional state
- Changes in behaviour
- Changes in interpersonal behaviours
- Reporting changes in eating / sleeping habits
- Becoming socially withdrawn
- Changes in activity and mood
- Talking or joking about self-harm or suicide
- Expressing feelings of failure, uselessness or loss of hope
- Repeated physical pain or nausea with no evident cause
- An increase in lateness or absenteeism
- Poor concentration
- A change in character
- Excessive/increased irritability or emotional responses
- Lack of emotional responses
- Anxiety including nervousness, excessive worry, low mood.

Annex 7: FGM Reporting Diagram

For England:



## **Annex 8: Allegations of abuse made against staff**

### **Allegations against another staff member**

This section applies to all cases in which it is alleged that a current member of staff has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or;
- Possibly committed a criminal offence against or related to a child, and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children this includes behaviour taking place both inside and outside of work.

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:

- This should be referred to the DSL.
- Where there is a concern/allegation about Managing Director, the DSL and LADO should be informed.
- Where the concern/allegation is about the DSL, the Managing Director and LADO should be informed.

We will always deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. A 'case manager' will lead any investigation. This will be the DSL or the Managing Director where the DSL is the subject of the allegation.

If staff have a safeguarding concern or an 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 policy (see 17.16).

### **Allegations against Directors**

TLC recognises its duty to report concerns or allegations against its any member of TLC including staff and directors as well as tutors. All directors, TLC Executive Suite and staff and tutors must comply with the relevant Code of Conduct when performing their role in order to promote safer working practices.

These policies should be followed when any TLC Director has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. (KCSiE 2023, part 4, para 356).

### **Suspension of the accused until the case is resolved**

Our procedures for dealing with allegations will be applied with common sense and judgement. Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within another department of TLC so that the individual does not have contact with the child or children concerned.
- If the concern is about a tutor, providing a supervisor to be present when the individual has classes with children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment



## Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or defame the individual.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded:** to reflect cases where there is no or poor evidence or proper basis which supports the allegation being made.

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the child's school's DSL and designated officer at the child's local authority if appropriate. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer– for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the school's DSL or designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, the Managing Director, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the school's DSL and develop a personalised safeguarding risk assessment. If necessary, the DSL or the school's DSL may make a referral to children's social care.
- If immediate suspension is considered necessary, agree and record the rationale for this with the Managing Director and another member of Senior Leadership. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at TLC and their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the Senior Leadership Team what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the Senior Leadership Team to initiate the appropriate action within TLC and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with the child's school and/or

children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against tutors (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a tutor will be advised to seek legal advice.

- Keep the parents or carers of the child/children involved informed of the progress of the case through the school (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If we are made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. If the police are involved, wherever possible we will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in our disciplinary process, should this be required at a later point.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 5 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

#### *Action following a criminal investigation or prosecution*

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### *Conclusion of a case where the allegation is substantiated*

If the allegation is substantiated and the individual is dismissed or we cease to use their services, or the individual resigns or otherwise ceases to provide their services, we will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

#### *Individuals returning to work after suspension*

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still undertaking tuition with TLC.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

- Shown to be deliberately invented, or malicious, TLC will consider whether any disciplinary action is appropriate against the individual(s) who made it,

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, we will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### **Confidentiality and information sharing**

We will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the school's DSL, LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference. In these cases, we will provide a copy to the individual, in agreement with children's social care or the police as appropriate. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

### **Learning lessons**

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to our procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.

- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated.
- We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made. Including:

- The time frame of responses.
- The clarity of communication between individuals.

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with the relevant local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to TLC that they were abused as a child, we will advise the individual to report the allegation to the police.

### **Whistleblowing**

What should TLC staff should do if they have concerns about safeguarding practices within the organisation. All staff should feel able to raise concerns about poor or unsafe practice and potential failures in TLC's safeguarding provision and know that such concerns will be taken seriously by the senior members of the organisation. See TLC's Whistleblowing Policy for more guidance.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- General guidance on whistleblowing can be found via: [Whistleblowing for employees](#).
- The [NSPCC Whistleblowing Advice Line](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is: [help@nspcc.org.uk17](mailto:help@nspcc.org.uk17).

## Annex 9: Roles and responsibilities in relation to filtering and monitoring

Role	Responsibility
Managing Director	Strategic responsibility for filtering and monitoring and need assurance that the standards are being met.
Technology Lead	<p>Responsible for ensuring these standards are met: and:</p> <ul style="list-style-type: none"> <li>• Procuring filtering and monitoring systems</li> <li>• Documenting decisions on what is blocked or allowed and why</li> <li>• Reviewing the effectiveness of the filtering and monitoring provision</li> <li>• Overseeing reports</li> <li>• Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable.</li> </ul> <p>Ensure that all staff:</p> <ul style="list-style-type: none"> <li>• Understand their role</li> <li>• Are appropriately trained</li> <li>• Follow policies, processes and procedures</li> <li>• Act on reports and concerns</li> </ul>
Designated Safeguarding Lead	<p>Lead responsibility for safeguarding and online safety, which could include overseeing and acting on:</p> <ul style="list-style-type: none"> <li>• Filtering and monitoring reports</li> <li>• Safeguarding concerns</li> <li>• Checks to filtering and monitoring systems</li> <li>• Supporting the Technology Lead in ensuring that staff understand this policy and that it is being implemented consistently throughout the school;</li> <li>• Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy;</li> </ul>
IT Manager	<p>Technical responsibility for:</p> <ul style="list-style-type: none"> <li>• Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online, including terrorist and extremist material;</li> <li>• Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy</li> </ul>
All Staff	<p>Responsible for:</p> <ul style="list-style-type: none"> <li>• Maintaining an understanding of the online safety policy, including their role in relation to filtering and monitoring</li> <li>• Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with the online safety policy.</li> </ul>