

Child Protection and Safeguarding policy



Please also refer to our separate:

Safer Recruitment Policy

Allegations against Staff including Low-level Concerns Policy

Date of Approval:

Signed: Ruth Minhall

Position: CEO

Next review: 01/09/2027

This policy is based on the model policy from The Key and is updated in line with their recommendations and any developments from our Safeguarding Partners. This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures, any significant events, or local child protection concerns.

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Tuition Extra Tuition Service		
Group Designated Safeguarding Lead (DSL)	Emma Sedgwick	emma.sedgwick@tuition-extra.co.uk 07923 447679
Head of Tuition Service	Helen Gardiner	Helen.gardiner@tuition-extra.co.uk 07526 204519
Referral Manager	Penny McDonnell	Penny.mcdonnell@tuition-extra.co.uk 07542 685925
Maypole Farm		
Head of Maypole Farm and Designated Safeguarding Lead (DSL)	Jamie Pickles	Jamie@tuition-extra.co.uk 07784 240745
Head of Animal Care and Deputy DSL	Sacha Phelps	Sacha@tuition-extra.co.uk 07395 334682
Forest School	Chloe Prevett	Chloe.prevett@tuition-extra.co.uk
Director of Human Resources	Jo Ferguson	Jo.ferguson@tuition-extra.co.uk 07852 965609
Local Authority Designated Officer (LADO)		The LADO Service and Education Safeguarding Service have merged. They can be contacted via Kent integrated children's platform on KELSİ. https://www.kelsi.org.uk/child-protection-and-safeguarding/LADO-Education-Safeguarding-Advisory-Service
Channel helpline		020 7340 7264

1. Aims

Tuition Extra aims to ensure that:

- o Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- o All staff are aware of their statutory responsibilities with respect to safeguarding
- o Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Maintained services governance guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on the following legislation:

- o Part 3 of the schedule to the [Education \(Independent Service Standards\) Regulations 2014](#), which places a duty on academies and independent services to safeguard and promote the welfare of students at the service
- o The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- o Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- o [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- o The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- o Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026) which defines what 'regulated activity' is in relation to children
- o [Statutory guidance on the Prevent duty](#), which explains services' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- o The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- o [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means all our staff should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our service to take positive action to deal with particular disadvantages affecting a specific group of students (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- o [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard for eliminating unlawful discrimination, harassment and victimisation. The PSED helps us focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- o The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- o Operation Encompass statutory guidance, which explains that the police must notify our service of any incidents involving domestic abuse

3. Definitions

Safeguarding and promoting the welfare of children means:

- o Providing help and support to meet the needs of children as soon as problems emerge
- o Protecting children from maltreatment whether that is within or outside the home, including online
- o Preventing impairment of children's mental and physical health or development
- o Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- o Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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. Appendix 1 defines neglect in more detail.

Making or sharing nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18. Tuition Extra has a separate Adult Safeguarding Policy for the young people aged 18-25 who also access our service.

Adult safeguarding is protecting an adult's right to live in safety, free from abuse and neglect and to make choices about what happens in your life.

The following 3 **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). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- o The local authority (LA). Our Local Authority is within Kent County Council - <https://www.kent.gov.uk/education-and-children/protecting-children>

- o Integrated care boards (previously known as clinical commissioning groups) for an area within the LA. Our local board is Kent and Medway Integrated Care Board
<https://www.kentandmedway.icb.nhs.uk/>
- o The chief officer of police for an area in the LA area. Kent Police has a duty to investigate criminal offences and refer any suspicion, allegation or disclosure that a child or adult at risk may be suffering significant harm to Kent County Council. Chief Constable Tim Smith is responsible for Safeguarding in Kent. Chief Inspectors Elizabeth Jones and Lara Connor head the Kent and Medway Vulnerability Reduction Unit.

In addition, Kent Safeguarding Children Multi-Agency Partnership (KSCMP) is a statutory multi-agency partnership which brings together agencies that work to safeguard and promote the welfare of children and young people and ensure arrangements are working effectively to bring about good outcomes for children. More information is available on the KSCMP website : [Home - Kent Safeguarding Children Multi-Agency Partnership](#)

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, 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.

We give special consideration to children who:

- o Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- o Are young carers
- o May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- o Have English as an additional language (EAL)
- o Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- o Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- o Are asylum seekers
- o Are at risk due to either their own or a family member's mental health needs
- o Are looked after or previously looked after (see section 12)
- o Are missing or absent from education for prolonged periods and/or frequently
- o Whose parent/carers has expressed an intention to remove them from service to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility, which means whether you are a permanent member of staff at Tuition Extra, self-employed member of staff, on a temporary contract, are a casual or agency worker, volunteer or contractor/sub-contractor, you have the same responsibility when you suspect or recognise that a child, young person or adult at risk may be a victim of harm or abuse.

This policy applies to all staff and volunteers at Tuition Extra and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to off-site activities.

Tuition Extra plays a crucial role in preventative education. This is in the context of a service-wide approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, racism, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- o Behaviour policy
- o Pastoral support system
- o Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

At Tuition Extra, ALL staff are directed to read at least KCSIE Part 1 as part of their ongoing commitment to protect the children in our care from harm

All staff will:

- o Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), (KCSIE) and review this guidance at least annually
- o Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- o Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- o Provide a safe space for students who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- o Our systems that support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL), the Group DSL and Deputy DSLs, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education/who are absent from education (CME)
- o Be aware of Tuition Extra's unauthorised absence procedures and children missing education procedures
- o The early help assessment process 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
- o The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- o The process for community-based Family Help assessments
- o What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- o The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- o The safeguarding issues that overlap and can put children at risk of harm, including
 - o Drug taking and/or alcohol misuse
 - o Unexplainable and/or persistent absences from education
 - o Serious violence, criminal exploitation (including that linked to County Lines), radicalisation
 - o Consensual and non-consensual making or sharing of nudes and semi-nudes
- o New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- o The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- o The fact that children can be at risk of harm inside and outside of their home, at our service and online
- o The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child is suffering or is at risk of suffering abuse, neglect or exploitation
- o The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be vulnerable to targeted bullying
- o The potential vulnerabilities of children who are questioning their gender
- o That a child and their family may be experiencing multiple needs at the same time
- o What to look for to identify children who need help or protection

Appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our Tuition Extra Group DSL is **Emma Sedgwick**, who is based at Roper Yard. The DSL at Maypole Farm is the Head of Maypole Farm, **Jamie Pickles**. The DSL takes lead responsibility for child protection and wider safeguarding at Tuition Extra and Maypole Farm. This includes online safety and understanding our filtering and monitoring processes on service devices and service networks to keep students safe online. All DSLs and DDSLs undertake Level 3 Safeguarding Lead (DSL) training from High Speed Training <https://www.highspeedtraining.co.uk/> (a recognised training body) to ensure consistency with qualifications being renewed in line with statutory guidance.

During term time, the DSL will be available from 8am-5pm for staff to discuss any safeguarding concerns.

Staff are encouraged to see Emma in person or call her on 07923 447679 whenever they feel they need to discuss a safeguarding matter and can reach her outside of working hours if they believe the matter is urgent. Staff can email her as well at emma.sedgwick@tuition-extra.co.uk. For concerns based at Maypole Farm, staff are encouraged to see Jamie in person or call him on 07784 240745. Alternatively, staff can email him at jamie@tuition-extra.co.uk.

When the DSL is absent, the Deputy DSLs will cover the DSL; their details can be found under the contents page of this document

If the DSL and DDSLs are not available, The CEO and Head of Service, Ruth Minhall, (07960 188295 or ruth@tuition-extra.co.uk) will act as cover (for example, during out-of-hours/out-of-term activities).

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

- o Provide advice and support to other staff on child welfare and child protection matters
- o Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- o Contribute to the assessment of children
- o Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- o Have a good understanding of harmful sexual behaviour
- o Have a good understanding of the filtering and monitoring systems and processes in place at our service
- o Emma Sedgwick is Prevent Lead and is responsible for Prevent Training across the Group

The DSL will also:

- o Keep the CEO and Head of Service informed of any issues
- o Lead regular SLT meetings relating to safeguarding and any operational or service delivery issues relating to this and maintain records with action points
- o Disseminate learning from any serious case reviews, safeguarding adult reviews, domestic homicide reviews, and other safeguarding reviews and audits.
- o Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- o Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare Tuition Extra's policies

- o Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- o Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- o Ensure that child protection files are kept up to date and are transferred as appropriate

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

5.3 The Group DSL with SLT will

- o Facilitate a whole-group approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- o Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO/Head of Service to account for its implementation
- o Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our service's local multi-agency safeguarding arrangements
- o Appoint a member of SLT (other than the **Group DSL Emma Sedgwick**) to monitor the policy and provision and assess its effectiveness. This is always a different person from the DSL
- o Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- o Ensure that Tuition Extra has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the service in meeting these standards
 - Ensure that Tuition Extra has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect students.

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-service approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The service has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- o Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the service roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the service about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the service premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Human Resources Team will act as the 'case manager' in the event that an allegation of abuse is made against the CEO, where appropriate (see Appendix 3).

5.4 The CEO (with support from the Group DSL)

The CEO is responsible for the implementation of this policy, including ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- o Communicating this policy to parents/carers when their child joins Tuition Extra (or appointing someone to do this on their behalf with monitoring that this is completed) and via Tuition Extra's website
- o Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- o Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3)
- o Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- o Providing access to regular supervision for the DSLs and the DDSLs and on an ad-hoc basis for any staff that require this.

6. Confidentiality

Tuition Extra has specific policies on Safer Recruitment, Allegations against Staff, Low-level Concerns, Online Safety, Data Protection and Cyber Security (including CCTV). We understand that:

- o Timely information sharing is essential to effective safeguarding
- o Arrangements should be in place setting out the processes and principles for sharing information within the service with the local authority, children's social care, the safeguarding partners and other organisations, agencies and practitioners as required
- o 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
- o The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- o 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

- o 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
- o If a victim asks Tuition Extra staff not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 -

The DSL should consider that:

- o Parents or carers should normally be informed (unless this would put the victim at greater risk)
- o The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- o Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- o Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- o The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- o If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- o Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in Appendix 3

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer

- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - o Is frequently missing/goes missing from education, care or home
 - o Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
 - o Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
 - o Is at risk of being radicalised into terrorism
 - o Has a parent or carer in custody, or is affected by parental offending
 - o Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
 - o Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - o Is misusing drugs or alcohol
 - o Has returned home to their family from care
 - o Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
 - o Is a privately fostered child

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Referrals can be made through the online access to Children's Integrated Services online via 'Front Door'. To access this, type in KELS, which is the KCC education portal. In the search bar write 'Front Door'. Click on Children's portal and you can then complete an online referral.

<https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/front-door>

You must be registered and have login details to do this. Referrals and consultations can be made by professionals or members of the public by phone: 03000 41 11 11. You can ask for advice on this number, prior to making a referral.

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

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

- 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. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Tuition Extra uses the safeguarding platform CPOMS to report any safeguarding issue. Tuition Extra use CPOMS to report consistent absence too, knowing that absence may suggest a safeguarding risk. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- o Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- o Not recognise their experiences as harmful
- o Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a student is at risk of FGM

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

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'.

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 Appendix 4 of this policy.

Any teacher who either:

- o Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- o 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, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

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 and follow our local safeguarding procedures.

The duty for teachers 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.

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried or discovers that a student aged 18 or over appears to have been a victim of FGM, should speak to the DSL and follow our local safeguarding procedures.

All Tuition Extra Group staff receive specific FGM training. Kent Police advise that in the case of someone suspecting a female has undergone this, they can complete an online report or call 101 or, if they feel the female is at risk, they can call 999. During the training it is made clear that a 999 call will be treated as an emergency as FGM is considered Child Abuse in the UK. Reporting on someone over 18 should still be completed.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). <https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/front-door>

Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Once a referral has been submitted, a relevant member of Children's Integrated Services will email the referrer and say how the referral has been allocated; this may be to a social worker or team, or to Early Help. The EH worker's name and contact details will be given.

Referral

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.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should 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.

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

A further consultation can be asked for to establish escalation procedures, where appropriate.

7.5 If you have concerns about extremism

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.

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 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.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, **020 7340 7264**, which service staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

7.6 If you have a concern about mental health

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.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm)

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, 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. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- o Significant changes in behaviour,
- o Ongoing difficulty sleeping
- o Withdrawing from social situations
- o Not wanting to do things they usually like
- o Physical signs of self-harm or neglecting themselves

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.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

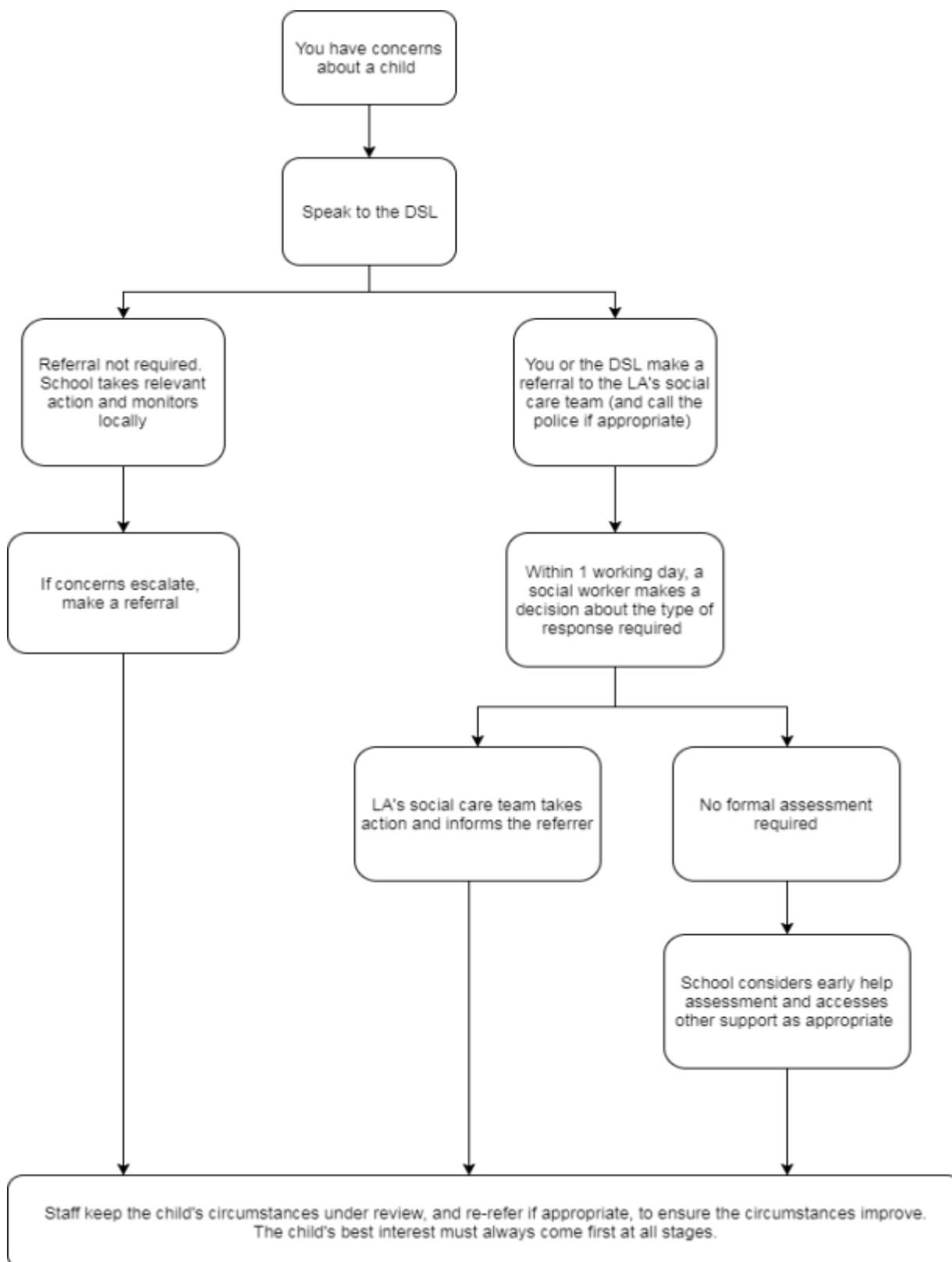
If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

If staff at Tuition Extra become concerned with a deterioration in someone's mental health and/or wellbeing, they should raise this on CPOMS to trigger actions. In the first instance, parents

will be contacted and a plan developed in liaison with parents and local agencies such as CAMHS (our nearest office for CAMHS is in Georges Turles House in London Road **0300 300 1984**)

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head of Service as soon as possible. If the concerns/allegations are about the Head of Service or CEO, speak to the Director of HR Jo.ferguson@tuition-extra.co.uk and the local authority designated officer (LADO)

<https://webapps.kent.gov.uk/KCC.ChildrensPortal.Web.Sites.Public/Default.aspx>.

The Head of Service/Director of HR will then follow the procedures set out in Managing Allegations Against Staff including Low Level Concerns Policy, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Head of Service, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the service premises for running an activity for children, follow our service safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other students

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or 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, misogyny/misandry and an unsafe environment for students.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators.

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under Tuition Extra's 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:

- o Is serious, and potentially a criminal offence
- o Could put students in the service at risk
- o Is violent
- o Involves students being forced to use drugs or alcohol
- o 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, including where generated by AI), which may include or be driven by misogyny/misandry

See **Appendix 4** for more information about child-on-child abuse.

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

If a student makes an allegation of abuse against another student:

- o You must record the allegation on CPOMS and tell the DSL, but do not investigate it
- o The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- o The DSL will put a 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. This will include

considering service transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- o The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Tuition Extra will follow specific advice from Social Services and (where a crime has been alleged) Kent Police, so that we deal with each case individually and correctly.

Creating a supportive environment in Tuition Extra and minimising the risk of child-on-child abuse

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.

To achieve this, we will:

- o Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- o Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing-type violence with respect to boys
- o Ensure our curriculum helps to educate students about appropriate behaviour and consent
- o Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- o Ensure staff reassure victims that they are being taken seriously
- o Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- o Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- o Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies including misogynistic influencers, and recognise the impact this content could have on shaping students' attitudes
- o Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- o Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

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 at our service, 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 a peer 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
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s) and will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent Tuition Extra from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- o Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- o There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes (‘sexting’)

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response.

If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- o 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)
- o Delete the imagery or ask the student to delete it
- o Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- o Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- o Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

- o The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 4 for more information on assessing adult-involved incidents
- o 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 their SEN)
- o What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- o The imagery involves sexual acts and any student in the images or videos is under 13
- o The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the CEO/Head of Service and other members of SLT 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 the DSL

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 to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate).

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.

Informing parents/carers

The DSL will inform parents/carers 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

If it is necessary to refer an incident to the police, this will be done through Kent Police on 101/999 (as appropriate) and to Kent Police Youth Engagement Officers

Recording incidents

All incidents of sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

As a Tuition service, Tuition Extra does not have to follow a full, statutory curriculum. We tutor through a personalised curriculum based on specific learning needs and the requirements of that student at that time. Most children and young people placed with us are tutored on an interim basis with subjects suggested by KCC or other referrer, such as service or families. However, if we are teaching PSHE then we will also cover areas of the SRE curriculum that are most relevant to that young person at that time. If we are teaching about the issue of sharing of nudes, semi-nudes and sexting, then we will incorporate:

- o What it is
- o How it is most likely to be encountered
- o The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- o Issues of legality
- o The risk of damage to people's feelings and reputation

Students will learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the service will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- o Putting safeguarding first
- o Approaching from the perspective of the child
- o Promoting dialogue and understanding
- o Empowering and enabling children and young people
- o Never frightening or scare-mongering
- o Challenging victim-blaming attitudes

7.10 Reporting systems for our students

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- o Put systems in place for students to confidently report abuse
- o Ensure our reporting systems are well promoted, easily understood and easily accessible for students
- o Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback
- o At Tuition Extra we focus on relational work as an essential part of the learning process; children and young people should feel safe with their tutors in order that they can learn and thrive. Students are very trusting of the adults they work with and are keen to tell them a lot about themselves and their families. As we get to know our students, we understand that they might tell us things or speak in ways which may be a cause for concern. Tutors are encouraged to use My Concern for anything they see, hear or experience that worries them, or could lead to them being worried about a child.
- o If a child or young person makes a disclosure, we take that as a priority. We will always tell them that they have been brave to tell us and are not/ or have not done anything wrong. We will seek to reassure them that while we cannot keep what they tell us confidential; we will only tell a person that can help them (the DSL) and that other people at our site will not necessarily need to know about it. All staff receive regular and appropriate safeguarding training.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, Tuition Extra aims to:

- o Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and governors
- o Protect and educate the whole service community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- o Set clear guidelines for the use of mobile phones for the whole student and tutor community
- o Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- o **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- o **Contact** – being subjected to harmful online interaction with other users, such as 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
- o **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated by AI and online bullying
- o **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate students about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim
- o Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- o Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- o Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- o Staff are allowed to bring their personal phones to service for their own use, but will limit such use to non-contact time when students are not present
- o Staff will not take pictures or recordings of students on their personal phones or cameras
- o Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in service, use of the service's ICT systems and use of their mobile and smart technology
- o Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones

- o Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- o Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the service's IT systems.
- o Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our community
- o Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- o Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our service's policies in these areas, please refer to our Online Safety Policy

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Tuition Extra recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose students to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Tuition Extra will treat any use of AI to access harmful content or bully students in line with this policy and our anti-bullying policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the service. Tuition Extra's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- o Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- o Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Students with special educational needs, disabilities or health conditions

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- o Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- o Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- o The potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- o Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- o The need for intimate care or that these children are isolated from others
- o That these children are more likely to be dependent on adults for care
- o Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in service or being unable to understand the consequences of doing so

We offer extra pastoral support for these students. This includes, where appropriate:

- Thrive
- Counselling
- Mentoring
- Life Skills
- Play Therapy

The majority of our students have SEND, many of whom have complex co-occurring conditions. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. Tuition Extra consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

10.1 Transporting students

Students within our settings may require the use of transport such as Service mini-bus, our Service driver and staff vehicles. Please see our separate policy on Transporting Students.

11. Students with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's

medical condition might be withheld from the tuition centre or the child may be repeatedly sent to sessions without essential medication, putting them at risk.

12. Young carers

The service recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. Students with a social worker

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.

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

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:

- o Responding to unauthorised absence or missing education where there are known safeguarding risks
- o The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

We have appointed a designated teacher, **Emma Sedgwick** who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

Emma is a qualified teacher and our Group DSL and is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- o Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- o Work with virtual service heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

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:

- o Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- o The DSL has details of children's social workers and relevant virtual service heads

15. Students who are lesbian, gay, bisexual or gender questioning

Tuition Extra recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL

16. Pupils who are questioning their gender

16.1 Supporting students who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. Tuition Extra will ensure that children and their families are aware that, while the service will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

16.2 Involving parents/carers in cases of students questioning their gender

Where a child who is questioning their gender asks for support from Tuition Extra we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the service to make changes to how they are treated, the service will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The service will not initiate any action regarding social transition. However, when a student or their parent/carer requests that the service makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the service, and a child's parents/carers have been involved (as set out in [Keeping Children Safe in Education](#) (KCSIE)).

In making decisions about supporting social transition, the service will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the service's evaluation of the welfare and best interests of the child and other children. The service will make decisions in line with the following principles:

- o The service has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- o Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the service parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- o Accommodating social transition is an active intervention so the service will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- o The service will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The service will ensure that the decision-making process is documented, and records are kept.

The circumstances or needs of a child may change over time, and the service may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

Students are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions

We have not included guidance on single-sex sports as our students work in a different way and Sport is not part of the curriculum at Tuition Extra

17. Complaints and concerns about service safeguarding policies

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our policy on Managing Allegations Against Staff including Low Level concerns.

17.2 Other complaints

Please see our Complaints Policy for information on how we handle other complaints. This policy can be found on our website www.tuition-extra.co.uk. Any complaints raised about Tuition Extra students or the premises will be addressed by the Head of Service, with support from other SLT

17.3 Whistleblowing

Please see our Whistleblowing Policy for information. This can be found on our website

www.tuition-extra.co.uk

18. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- o A clear and comprehensive summary of the concern
- o Details of how the concern was followed up and resolved
- o A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child, which will be kept online in a secure platform (CPOMS). If we have a paper file for a student, then this is kept securely.

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.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the service.

If a child for whom Tuition Extra has, or has had, safeguarding concerns moves to another service, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new service/college to have support in place when the child arrives, this should be within:

- o **5 days** for an in-year transfer, or within
- o **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving service and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Our safeguarding records are kept on a secure platform called CPOMS. We keep the information for the length of time recommended under the Data protection Act 2018. Only Senior staff have access to CPOMS administration, which is managed by the **Group DSL, Emma Sedgwick**.

If we are asked to share safeguarding information this must be in writing from an official place of work e.g. a school. The request will then be followed up with a phone call to the person requesting the information to see the exact nature of what is required and why.

If a child is receiving tuition from Tuition Extra, but is on roll at a school, then all safeguarding information is shared with the DSL of the school, in writing and verbally, and is also kept securely on My Concern.

In addition, please see our policy on Safe Recruitment on record-keeping specifically with respect to recruitment and pre-appointment checks. Also please refer to our Managing Allegations including Low Level Concerns policy with respect to allegations of abuse made against staff.

19. Training

19.1 All staff

All staff members including temporary, voluntary and agency staff will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, complaints and online safety, to ensure they understand the Tuition Extra's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. Staff are not permitted to commence work with the Service until they have evidenced undertaking Safeguarding, Prevent and My Concern training.

This training will be regularly updated and will:

- o Be integrated, aligned and considered as part of the whole-service safeguarding approach and wider staff training, and curriculum planning
- o Be in line with advice from the 3 safeguarding partners
- o Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- o Have regard to the Teachers' Standards, Professional Standards for Teachers and Trainers in the Further Education and Training Sector, HLTA standards and TA standards (where appropriate)

To support the expectation that all staff working with students (in addition to their safeguarding and child protection duties:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all students

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including online safety, as required but at least annually (for example, through September CPD in-person, emails, e-bulletins, e-training and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

At a minimum, induction training contains:

- Awareness of adult safeguarding
- Awareness of child sexual exploitation
- Missing persons
- Child trafficking
- Radicalisation (Prevent)
- Gang exploitation
- FGM

19.2 The DSL and DDSs

The DSL and 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).

This role is included in their job descriptions and relevant certificates are held on file.

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

19.3 Recruitment – interview panels

At least 1 person conducting any interview for any post at the service will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

Please see our safe recruitment policy for further information.

19.4 Staff who have contact with students and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

20. Monitoring arrangements

This policy will be reviewed **at least annually** by the Group DSL and the Head of Service and/or following any updates to national and local guidance and procedures, any significant events, or local child protection concerns. At every review, it will be approved by the CEO.

18. Links with other policies

Safeguarding is central to the ethos and daily practice at **Tuition Extra**. It underpins all aspects of our work with students, families, and partner agencies. We are committed to ensuring that every learner is safe, valued, and supported to achieve their potential. Safeguarding is not viewed in isolation, but as a golden thread running through all our policies, procedures, and provision. Our approach reflects statutory guidance, including *Keeping Children Safe in Education (KCSIE)* and *Working Together to Safeguard Children*, and promotes a culture of vigilance, accountability, and continuous improvement. The following policies and procedures are closely linked to this safeguarding policy and together ensure a coherent, consistent, and robust framework for protecting children and young people at Tuition Extra.

- o Acceptable use of ICT and Online Safety Policy
- o Admissions
- o Anti-Bullying
- o Attendance
- o AI
- o Behaviour
- o CCTV
- o Complaints
- o Curriculum
- o Cyber Security
- o Data Protection
- o Equality
- o Health and safety
- o Managing Allegations Against Staff (including low level concerns)
- o Safe Recruitment
- o SEND
- o Staff Code of Conduct
- o Whistleblowing
- o Transporting students

The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of abuse

Abuse is 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 in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical abuse 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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- o Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- o Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- o 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
- o Seeing or hearing the ill-treatment of another
- o Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- o Verbal abuse such as criticism, belittling, or name-calling

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:

- o 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
- o 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.

Neglect 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. 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:

- o Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- o Protect a child from physical and emotional harm or danger
- o Ensure adequate supervision (including the use of inadequate care-givers)
- o Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer Recruitment and DBS checks – policy and procedures

Please see our separate Safer Recruitment Policy

Appendix 3: Allegations of abuse made against staff

See separate Managing Allegations Against Staff including Low Level Concerns Policy

Appendix 4: Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- o Contacted by an online account that they do not know but appears to be another child or young person
- o Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- o Moved from a public to a private/E2EE platform
- o Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- o Offered something of value such as money or gaming credits
- o Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- o Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- o Use images that have been stolen from the child or young person taken through hacking their account
- o Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- o Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- o Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- o Moved from a public to a private/E2EE platform
- o Pressured into taking nudes or semi-nudes
- o Told they have been hacked, and they have access to their images, personal information and contacts
- o Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly or for long periods at a time, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- o Are at risk of harm or neglect
- o Are at risk of forced marriage or FGM
- o Come from Gypsy, Roma, or Traveller families
- o Come from the families of service personnel
- o Go missing or run away from home or care
- o Are supervised by the youth justice system
- o Cease to attend a school
- o Come from new migrant families

We will follow our procedures for unauthorised absence based on KCC And DfE absence codes and procedures for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves Tuition Extra without prior knowledge from the Local Authority and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage 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. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- o Appearing with unexplained gifts or new possessions
- o Associating with other young people involved in exploitation
- o Suffering from changes in emotional wellbeing
- o Misusing drugs and alcohol
- o Going missing for periods of time or regularly coming home late
- o Regularly missing school or education
- o Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL 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

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats 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. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. 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. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- o Having an older boyfriend or girlfriend
- o Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL 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-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of Tuition Extra. It can also take place both face-to-face and online and can occur simultaneously between the two.

Our service has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- o Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- o Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- o 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)
- o Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- o Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- o 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
- o Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), including those generated using AI
- o 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
- o 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

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 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic 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 (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made by the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for [information sharing](#).

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and DDSL's 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).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carer (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) 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 HBA 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 HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 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:

- o A student confiding in a professional that FGM has taken place
- o A mother/family member disclosing that FGM has been carried out
- o A family/student already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or 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 service, 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:

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

- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking 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)
- Being unexpectedly absent from service
- Having 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.

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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will inform the DSL and speak to the student privately and together

The DSL will:

- o Speak to the student about the concerns in a secure and private place
- o Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- o Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmua@fco.gov.uk
- o Refer the student to an education welfare officer, pastoral tutor, learning mentor, or service counsellor, as appropriate

Preventing radicalisation

- o **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- o **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or

- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

o **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.

Tuition Extra has a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in Tuition Extra from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our students to stay safe online at service and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and the [NSPCC](#) say that signs that a student is being radicalised can include:

- o Refusal to engage with, or becoming abusive to, peers who are different from themselves
- o Becoming susceptible to conspiracy theories and feelings of persecution
- o Changes in friendship groups and appearance
- o Rejecting activities they used to enjoy
- o Converting to a new religion
- o Isolating themselves from family and friends
- o Talking as if from a scripted speech
- o An unwillingness or inability to discuss their views
- o A sudden disrespectful attitude towards others
- o Increased levels of anger
- o Increased secretiveness, especially around internet use
- o Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- o Accessing extremist material online, including on social media
- o Possessing extremist literature
- o 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 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** act if they are worried.

Further information on the service's measures to prevent radicalisation are set out in other service policies and procedures.,

Harmful Sexual behaviour violence and sexual harassment between children in Education Services

Tuition Extra will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- o Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- o Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- o Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- o Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

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

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or tuition centre.

If a victim reports an incident, it is essential that staff 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- o Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- o Regularly review decisions and actions, and update policies with lessons learnt
- o Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- o Consider if there are wider cultural issues within the tuition centre that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- o Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- o Challenging inappropriate behaviours
- o Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- o 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
- o Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our tuition centre's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- o Physical assault
- o Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- o Criminal exploitation

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

- o Increased absence from education
- o Change in friendships or relationships with older individuals or groups
- o Significant decline in performance
- o Signs of self-harm or a significant change in wellbeing
- o Signs of assault or unexplained injuries
- o 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 above))

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

- o Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- o Having been involved in offending, such as theft or robbery
- o Being male
- o Having experienced child maltreatment
- o Having used drugs or alcohol in early adolescence
- o Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- o Assess the risk to both the individual pupil and others in the tuition centre, consider wider information or concerns and take appropriate action
- o Put in place a safety and support plan for the pupil (depending on the risk)
- o Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of the Receptionist/Office Administrator (TE) or Head/Deputy Head or other management team member (MF) (who should have been informed of the visit beforehand).

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in electronically and wear a visitor's badge (on a lanyard) with their temporary photograph.

Visitors to the service who are visiting for a professional purpose, such as educational psychologists and service improvement officers, will be asked to show photo ID and:

- o The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the service any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using service facilities is not seeking to disseminate extremist views or radicalise students or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

Call parent/carer and emergency contact if parent does not answer. If we know the child receives taxi transport, we will call the taxi company. If the taxi company is responsible for picking the child up but for some reason is unable to we will, with the permission of the parent/carer or emergency contact, make arrangements for them to get home safely with either our driver or a staff member (who will have an enhanced DBS, vetting clearance and business insurance). We will never leave a child unattended if they are not picked up on time.

Missing students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

It is Tuition Extra policy to report on My Concern when a child has missed 2 consecutive lessons with 1 tutor. If it becomes apparent that the child is not attending lessons we contact the EHCP Caseworker and inform them. If a parent has refused to accept tuition then we will inform the

caseworker straight away. If we have been unable to make contact via phone and email with the parent/carer, we will again contact the caseworker and suggest we report the child as CME. Throughout all communication we will be guided by the Local Authority unless we are not able to make contact with the caseworker, at which point we will contact the Safety Valve Lead at the Local Authority. If we are concerned that the child is in danger, we will inform Social Services and/or the Police as appropriate.