Safeguarding Policy

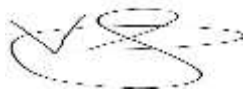| Name	Role	Job title	Training date	Contact
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Report concerns here				

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Review

Review cycle	Date of current policy	Author(s) of current policy	Review date
Annual	10/08/2022	Vanessa Leach Philip Eastman	10/08/2023

Reviews completed

Role	Name	Signature	Date
Managing Director	Vanessa Leach		10/08/2022
Business Manager	Philip Eastman		10/08/2022

Details of Policy Updates

Date	Details
10/08/2022	Changes made following review of Keeping Children Safe in Education 2022 amendments: - Added two new points to staff responsibilities to identify students may not be ready to disclose and it is our staffs duty to build a trusted relationship to help facilitate communication (S 8.1)

18/08/2021	- Changed peer on peer abuse to child-on-child abuse as per KCSiE terminology change. - updated references to KCSiE 2022 in preparation for change in September 2022
31/03/2021	Annual policy review as per commitment: - Added new section to responding to ~~peer on peer~~ child-on-child abuse (S 16.5) - Updated reference and links to KCSiE September 2021.Update to reporting process Section 16 and Appendix B to include new, secure online form.
01/09/2020	General improvements to policy clarity/structure Policy Reviewed as per Annual Commitment Safeguarding definition updated to clarify prevention of impairment of health is both mental and physical, as per amendment to KCSiE 2020 (pg3) Updated all staff's responsibility to include awareness of extra-familial harms (pg 6) Added new paragraph to staff expectations to raise awareness of ACES and poor mental health is an indicator of abuse/harm experienced and to report mental health concerns using the safeguarding reporting process (pg 13) Added when to call the policy, NSPCC guidance to useful links (Appendix D) Updated references to KCSiE from 2019 to 2020
01/09/2022	Updated references to KCSiE from 2019 to 2020

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Part one: Policy

1   Introduction

Tute puts the student at the core of everything we do and safeguarding them is our absolute priority. Safeguarding and promoting the welfare of children is **everyone's** responsibility.

Every child has the absolute right to a childhood free from abuse, neglect or exploitation. We want students to learn and achieve safely.

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child. **Everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

> **Tute Education** is committed to safeguarding and promoting the welfare of children by:

- Providing of a safe online environment in which children and young people can learn.

- Fulfilling our statutory (legal) responsibilities to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm

- Reporting any concerns to the relevant contacts to ensure that a suitable response is taken

2   Purpose and aims

The purpose of this policy is to:

- protect children and young people who receive Tute's services from harm.

- provide staff, as well as children and young people with the overarching principles that guide our approach to child protection

This policy applies to anyone working on behalf of Tute, including senior leaders and the board of directors, employed staff, contracted staff, and students

This policy will contribute to the safeguarding of students who use our online education service at **Tute** by:

- Creating a safeguarding culture
- Clarifying standards of behaviour for staff and students
- Equipping staff with the ability to identify the signs and indicators of safeguarding issues
- Contributing to the establishment of a safe, resilient, and robust safeguarding ethos in the organisation, built on mutual respect and shared values

- Teaching children about safeguarding, including online, through teaching and learning opportunities, as part of broad and balanced curriculum
- Developing staff awareness of the risks and vulnerabilities their students face by addressing concerns at the earliest possible stage
- Working in partnership with students, parents, schools, LAs and non-mainstream who use our online education service
- Designing plans to meet safeguarding needs

3   Tute's beliefs and commitment

We believe that:

- Children and young people should never experience abuse of any kind
- We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them
- Safeguarding should be a priority in the creation of the online environment

We recognise that:

- The welfare of children is paramount in all the work we do and in all the decisions we take all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with schools, children, young people, their parents, carers and other agencies is essential in promoting young people's welfare

We will seek to keep children and young people safe by:

- valuing, listening to and respecting them
- appointing a nominated child protection lead for children and young people, a deputy and a lead trustee/board member for safeguarding
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- recording, storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: ico.org.uk/fororganisations]
- sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions

- making sure that children, young people and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

4 Legislation

All action taken by Tute Education will be in accordance with current legislation set out in the Education Act 2002, section 175.

5 Statutory guidance

Keeping Children Safe in Education (2022)

Statutory guidance issued by the Department for Education which sets out the legal duties to safeguarding and promote welfare of children and young people under the age of 18 in schools and colleges.

Working Together to Safeguard Children (2018)

Sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.

Sexual violence and sexual harassment between children in schools & colleges (2021)

Provides advice for schools for colleges on how to prevent and respond to reports of sexual violence and harassment between children.

Teacher Standards (2011)

States that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All key documentation, procedures and guidelines are detailed in Appendix A

All staff at **Tute** have a role and responsibility to safeguard children and young people attending our online provision, irrespective of their role within the school by:

- Identifying concerns early and providing help for children and young people, to prevent concerns from escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. These concerns should be discussed with the organisation's Designated Safeguarding Lead.

- All staff should be aware of the process and principles for sharing information within the organisation.

- All staff should be aware that safeguarding incidents and behaviour can be associated with factors outside the school and/or can occur between children (child-on-child abuse) outside of these environments. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual and criminal exploitation and serious youth violence.

- The most important consideration is whether sharing information is likely to safeguard and protect a child.

- **Any staff member who has a concern about a child's welfare should follow the referral processes set out in Appendix B**

6 Related policies

This policy should be read in conjunction with the following policies:

- Whistleblowing Policy
- Safer Recruitment Policy
- Managing Allegations Policy
- Anti-bullying Policy
- Behaviour Policy
- Data Protection Policy
- Serious Incident Policy
- Online safety Policy
- Code of Conduct that sets out behaviours and roles
- Safeguarding Training Strategy

7 Definitions

7.1 Child

A child is a person under the age of 18.

7.2 Safeguarding

Safeguarding children is defined in Working together to safeguard children (2018) as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

7.3 Child Protection

Child protection refers to the situation where a child is suffering significant harm, or is likely to do so, and action is required to protect that child.

7.4 Child abuse

Child abuse is the maltreatment of a child by another person – by adults or children. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional, educational or community setting by those known to them or, more rarely, by others unknown to them e.g. via the internet.

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Child abuse and neglectful behaviour can and does happen to children from any background, culture, class, ethnicity or faith and can be physical, sexual or emotional. It is important that everyone involved in recognising the signs of child abuse understands the physical indicators and symptoms.

See Appendix B and C for more information about abuse.

See here for further information: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

7.5 Disclosure

Disclosure is the process by which a child will let someone know that abuse is taking place. This may not happen all in one go and may be a slow process that takes place over a long period of time.

7.6 Concern

A safeguarding **concern** is a feeling or worry that a child or adult may be at risk of harm, or may have been harmed.

See Appendix B and C for more information about how children may be at risk.

8 Code of conduct

If a child is in immediate danger or is at risk of harm, a referral should be made to the DSL/DDSL immediately.

Anyone can make a referral. Where referrals are not made by the DSL, they should be informed, as soon as possible, that a referral has been made.

8.1 Staff will:

All staff will:

- Put the student at the core of their work
- Understand this safeguarding policy (please ask DSL if you require support)
- Adhere to this safeguarding policy as well as supporting policies listed in Section 6
- Be subject to Tute's safer recruitment process including checks

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- Be involved, where appropriate, in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans
- Be vigilant to signs and indicators of possible abuse
- Report **all** concerns that they have, following the Tute reporting process laid out in Appendix B
- Record concerns and give the record to the DSL
- Promote a culture of safeguarding
- Assume that "it can happen here"
- Understand students may not feel ready to tell you that they are being abused but this must not prevent you from having a professional curiosity and reporting concerns you have regarding a student.
- Determine how to build a trusted relationship with students to facilitate communication.
- Ask DSL or DDSL for permission to contact students outside of Tute's platform. Agreement will be granted in exceptional circumstances, with a member of the Tute team copied into correspondence, and only when communication is not possible in the platform

8.1.1　Staff will not:

- Not befriend/follow/accept requests/communicate with students on any social networking site
- Not communicate with pupils outside of the context of our secure learning environment
- Never meet students in person
- Not request personal information or contact details from students.
- Never ask that students use webcams
- Never give out any personal details
- Not ask students for personal details
- Not ask students for images

8.2　Students

All students should:

- Never share social media details in the chat box.
- Not use profane language.
- Never use threatening behaviour.
- Not ask teachers personal details.
- Not be over familiar.
- Never give out their login details to anyone.

8.3 **Schools**

All schools should:

- Make sure students are aware of and agree to follow our student behaviour policy and code of conduct.
- Add safeguarding@tute.com onto their whitelist as this is how they will receive safeguarding reports.
- Provide us with the outcome of any safeguarding report.
- Provide a safeguarding contact.

9 Training

Please read Tute Training Strategy alongside the summary below

- In addition to this policy, **all** staff should read and understand Part One: Keeping Children Safe in Education (KCSIE) (2022)
- All staff members must complete Level 2 safeguarding training at induction and every year thereafter. The training will be regularly updated
- Induction and training will be in line with advice from the Department for Education and safeguarding partnerships
- All training will be contextualised to take into account the online nature of Tute and the different requirements for this environment
- All staff will complete Tute-specific assessments that will assess knowledge of policies, processes, and procedures
- All staff will receive frequent safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) to provide them with relevant skills and knowledge to safeguard children effectively
- Whistleblowing procedures will be covered in annual Inset training, so that staff know what to do if they have concerns relating to safeguarding practice within the organisation
- All training will be effective and comply with the law at all times
- The DSL and DDSL will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years.

- Tute will ensure that at least one person on any appointment panel will have undertaken safer recruitment training, in line with School Staffing (England) Regulations 2009.
- The DSL will undertake Prevent awareness training and in turn will provide advice and support to staff on protecting children from the risk of radicalisation.
- Online safety training for staff will be integrated, aligned and considered as part of the overarching safeguarding approach
- Tute will Learn from Serious Case Reviews (SCRs), Domestic Homicide Reviews (DHRs) and other safeguarding reviews and disseminate and act on audits
- Tute will respond to and learn from national and local developments and guidance relating to safeguarding children/vulnerable adults
- Tute subscribes to Safeguarding Network for support, advice, updates, and training

10 Safer Recruitment and Selection

Please read Tute safer Recruitment Policy

Tute follows a rigorous safer recruitment process, detailed in the submitted policy, that meets Part 3: Safer Recruitment, Keeping Children Safe in Education (2022). All members of staff have been recruited with this process. Four members of the Tute team (DSL, DDSL, Head of HR and Compliance, and Head of Teaching and Learning) are trained in safer recruitment and at least one sits on every interview panel.

By ensuring that all employees are thoroughly vetted during the recruitment process, Tute can provide the maximum protection possible to its students and remain in full compliance with government regulations.

Offers of employment are made upon the condition of satisfactory completion of the necessary pre-employment checks: proof of identity; two written references; health questionnaire; right to work in the UK; lived or worked outside of the UK; qualifications check (including QTS for tutors); and enhanced DBS check with Barred List Check.

All Tute staff are subject to an enhanced DBS check with Barred List Check. All are required to register with the DBS Update Service; made clear at application stage (all Tute staff are subscribed). At application, all candidates confirm whether they have a current DBS check and are registered to the Update Service. With their permission (as per GDPR regulations) we check this.

If current and active, Head of HR and Compliance uses gov.uk website to check the DBS number is correct and view potential disclosures. If any disclosures cause concern, we will not offer a role. DBS information is recorded in Tute's Single Central Record (SCR). The individual's record is updated in Tute's Breathe HR system

If not current and active, the candidate must undertake a new DBS check. They can arrange this themselves via a third party of their choice or apply to the third party used by Tute (UCheck). The candidate must then register for the update Service and Process above is followed. DBS check and Barred List check audits are completed and recorded each half term by the head of HR & Compliance.

Tute maintains an electronic SCR where information about all checks is stored. Tute's Head of HR and Compliance is responsible for maintaining the SCR, supported by Tute's Business Manager/DDSL, and Head of T&L. The Managing Director/DSL is responsible for checking the accuracy of the SCR. Checks on the SCR are made by DSL/MD every month.

11 Role of the Designated Safeguarding Lead (DSL)

Details of Tute's Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) can be found on the cover page of this policy and are copied below:

Name	Role	Job title	Date training	Contact
Vanessa Leach	Designated Safeguarding Lead	Managing Director	12/09/2020	vanessa.leach@tute.com safeguarding@tute.com 07974 205317
Phil Eastman	Deputy Designated Safeguarding Lead	Business Manager	08/04/2021	phil.eastman@tute.com safeguarding@tute.com 0330 3309751

The DSL is a senior member of staff, who undertakes lead responsibility for safeguarding and child protection within the organisation.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for safeguarding child protection remains with the DSL.

The broad areas of responsibility for the DSL are:

- **Managing referrals** – Contacting other agencies within 24 hours of the report being received. Contacts include, the local authority children's social care in cases of suspected abuse; the Channel Programme where there is a radicalisation concern; the Disclosure and Barring Service in cases where a person is dismissed or left due to risk/harm to a child and the Police in cases where a crime may have been committed in relation to safeguarding. The DSL will also support and advise other staff in making referrals to other agencies and bring parents into the process where appropriate and possible.

- **Undertake Training** to ensure the DSL (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role.

- **Manage safeguarding information** through the collection, monitoring, reporting, reviewing, safe storage and transfer of safeguarding and child protection files in line with company policy.

- **Availability** of the DSL (or a deputy) during term time and school hours needs to be ensured for staff to discuss any safeguarding concerns.

A more detailed description of the role of the DSL is explained in more detail in Keeping Children Safe in Education (2022) – Appendix A

12 Creating a Culture of Safeguarding

12.1 Whole organisation approach

- Safeguarding is everyone's responsibility.

- All policies which address issues of power and potential harm, for example anti-bullying, and equal opportunities, will be linked to ensure a whole organisation approach
- The safeguarding policy cannot be separated from the general ethos of the organisation, which should ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

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

- Tute shall take every opportunity to promote safeguarding, creating a culture where safeguarding is at the forefront of our service delivery. Despite children not being directly in our care we will not assume another organisation is taking on responsibility for safeguarding and do everything in our power to safeguard pupils.

12.2 **What staff need to know**

All staff need to be aware of the systems within **Tute Education** which support safeguarding and child protection – this forms part of the induction process but also on-going training which is regularly updated.

All staff should:

- Know who is appointed as Tute's DSL and deputies and how to contact them;
- Read, understand and adhere to this policy and revisit it annually/or when significantly amended
- Read Part 1: Keeping Children Safe in Education (2022)
- Attend safeguarding training
- Be aware of the organisation's procedures in order to identify those students in need of early intervention/help and take appropriate action where there are concerns for the welfare and protection of children and young people

- Know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an

appropriate level of confidentiality whilst at the same time liaising the designated safeguarding lead. Staff should never promise a child that they will not tell anyone about an allegation - as this may ultimately not be in the best interests of the child (See Appendix C);

- Report concerns about a child/young person immediately or as soon as it is practicable to the DSL; however, if a child is in immediate danger the DSL would follow our reporting procedures immediately

- Be aware of signs of abuse or neglect see Appendix E

- Be aware of whistleblowing procedures to the senior leadership team if they have concerns about safeguarding practices within the organisation. Where a staff member feels unable to raise an issue with the senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them

  - General guidance can be found at- Advice on whistleblowing

  - Public Concern at Work - PCAW (Charity that supports Whistleblowers)

  - The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

- Be aware that if staff are employed in provision covered by the Childcare Regulations 2009 and fall within the scope of Disqualification under the Childcare Act 2006, they must complete a self-declaration form in addition to the enhanced DBS

- All staff should be aware that mental health problems, can in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If you have a mental health concern about a child, staff should report this using safeguarding process and procedures details in Annex B.

12.3   Staff support

It is recognised the stressful and traumatic nature of safeguarding and child protection work. **Tute Education** will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

Part 2: The Tute platform

Ensuring that students are safe whilst using our Learning Cloud is paramount.

13   Policy statement

We recognise that:

- Learning online provides students with unique opportunities that would otherwise not be available to them
- We have a duty to ensure that, whilst learning online with Tute, students are protected from harm
- The relative anonymity that The Learning Cloud provides may make students more likely to make a disclosure
- It is more challenging to identify safeguarding concerns in The Learning Cloud than in a face-to-face environment
- Staff have to be vigilant and well-trained to identify concerns

We seek to fulfil this duty by:

- Having a DSL and a deputy DSL in place to oversee online safety in the wider context of our safeguarding policies and procedures
- Providing clear instruction to our teachers about how to behave online through our code of conduct
- Supporting our students to use our Learning Cloud in a manner that keeps themselves and others safe
- Maintaining clear and robust procedures to respond swiftly and appropriately to any instances of inappropriate behaviour
- Reviewing and updating the security of our information systems regularly
- Ensuring that sensitive data is encrypted and adequately protected in transit
- Ensuring that personal information held about the adults and children who are involved with our organisation is held securely and shared only as appropriate

- Ensuring images and written information about students are used only after written permission has been obtained and only for the purpose for which consent has been given
- Providing supervision, support, and training for staff in online safety
- Examining and risk assessing any new technologies before they are used in our organisation

If online abuse occurs, we will respond to it by:

- Having clear and robust procedures in place for responding to abuse (including online abuse)
- Providing support and training for all staff on recognising and dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- Making sure our response considers the needs of the person experiencing he abuse, any bystanders and our organisation as a whole
- Reviewing our procedures to address online abuse at regular intervals to ensure any problems are resolved in the long-term

13.1 Online safety in lessons

- Every live lesson is recorded. This enables us to effectively evidence and safeguarding concerns and encourages student to be more aware of their behaviour in lessons.
- Webcams are locked. Students can see their teacher but cannot be seen by the teacher or by other students in the lesson. This creates a comfortable degree of anonymity for students.
- Lock features for the chatbox and microphone prevent the misuse of these features
- Chat can be immediately deleted. If a student shares inappropriate information, for example snapchat details, this can be immediately removed to limit exposure to bystanders in the lesson.
- In the event of a teacher losing connectivity during a lesson, the lesson will freeze so students are unable to interact without adult supervision

13.2 Online safety in Tute Spaces

Tute Spaces are secure areas in the Tute Platform that allow pupils to continue learning outside of lessons, through communication with each other and their teacher.

- Our profanity filter prevents the use of inappropriate language
- Post reporting method so inappropriate posts can be flagged to teacher who owns the space and admin

- Everything is saved in database and backed-up, deleted content can be recovered
- Backed up daily

13.3 Recording and playback

All Tute lessons are recorded automatically.

Recordings are stored securely within our platform. For more information on how the recordings are stored, please visit our data protection policy.

Access to playback is straightforward in Tute's platform. A list of playbacks can be found in the playback section and can be filtered to find the required lesson.

Playback supports safeguarding in that it allows us to watch/listen again to disclosures and provide this as evidence.

All activity is recorded, including the chat transcript.

13.4 Sharing student data with schools

In the interests of maintaining clear channels of communication with schools and collaborating to ensure the best outcomes for students, we recognise the importance of making progress tracking information available

- Progress trackers are made available to schools via a secure One Drive folder which is unique to their establishment
- Any data shared by email is sent using Egress encrypted mail delivery

14 Security of Tute's online classroom and platform

Our platform is hosted in the UK in a secure cloud environment

All data is encrypted at rest and in-transit using SSL/TLS. Our SSL connections are established using 2048-bit keys

Passwords are securely stored in our database using hashing algorithms

The content sent to and from the online classroom is encrypted using TLS/SSL

The audio, video and screen sharing within the online classroom uses WebRTC which transmits real-time protocol packets (RTP) over user datagram protocol (UDP) via Datagram Transport Layer Security (DTLS), and media packets are encrypted using Secure Real-Time Protocol (SRTP)

Part 3: Procedures

15 Recognising and responding to concerns

It can be very hard for children and young people to speak out about abuse. Often, they fear there may be negative consequences if they tell anyone what's happening to them.

Some may delay telling someone about abuse for a long time, while others never tell anyone, even if they want to.

It's vital that children and young people are able to speak out and that whoever they tell takes them seriously and acts on what they've been told.

Sometimes, children are more open in the more anonymous online environment; they may feel more comfortable in making a disclosure. Staff should be ready for this.

Even if a child doesn't tell someone verbally about what's happened to them, there may be other indicators that something is wrong. People who work with children need to be able to recognise the signs and know how to respond appropriately.

This section outlines best practice for recognising and responding to abuse and some of the issues which may arise when working with children who have been abused.

15.1 Identifying concerns

Recognising signs of abuse (see Appendices C and D) in the online environment can be more difficult than in face-to-face settings. Staff must be vigilant to spot other signs that may suggest abuse such as changes in behaviour, lower attendance, and interactions with other students.

15.2 How disclosure happens

Children and young people may disclose abuse in a variety of ways, including:

- **Directly**
  - making specific verbal statements about what's happened to them
- **Indirectly**
  - making ambiguous verbal statements which suggest something is wrong
- **Behaviourally**

- displaying behaviour that signals something is wrong (this may or may not be deliberate)
- **Non-verbally**
    - writing letters, drawing pictures or trying to communicate in other ways. This can be in the form of an assignment posted in Tute Spaces

Children and young people may not always be aware that they are disclosing abuse through their actions and behaviour.

Sometimes children and young people make partial disclosures of abuse. This means they give some details about what they've experienced, but not the whole picture. They may withhold some information because they:

- are afraid they will get in trouble with or upset their family
- want to deflect blame in case of family difficulties as a result of the disclosure
- feel ashamed and/or guilty
- need to protect themselves from having to relive traumatic events.

When children do speak out it is often many years after the abuse has taken place (McElvaney, 2015).

15.3 Barriers to disclosure

Some children and young people are reluctant to seek help because they feel they don't have anyone to turn to for support.

They may have sought help in the past and had a negative experience, which makes them unlikely to do so again.

They may also:

- feel that they will not be taken seriously
- feel too embarrassed to talk to an adult about a private or personal problem
- worry about confidentiality
- lack trust in the people around them (including parents) and in the services provided to help them
- fear the consequences of asking for help
- worry they will be causing trouble and making the situation worse
- find formal procedures overwhelming

(Mental Health Foundation and Camelot Foundation, 2006).

Not all children and young people realise they have experienced abuse, for example if they have been <u>groomed</u>.

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15.4 Responding to disclosure

Disclosure is the process by which children and young people start to share their experiences of abuse with others. This can take place over a long period of time – it is a journey, not one act or action.

Children may disclose directly or indirectly and sometimes they may start sharing details of abuse before they are ready to put their thoughts and feelings in order.

Not all disclosures will lead to a formal report of abuse or a case being made or a case being taken to court, but all disclosures should be taken seriously.

It takes extraordinary courage for a child to go through the journey of disclosing abuse.

It's vital that anyone who works with children and young people undertaking this journey is able to provide them with the support they need.

(Baker et al, 2019) found three key interpersonal skills that help a child feel they are being listened to and taken seriously:

- **show you care, help them open up:** Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are. Phrases such as 'you've shown such courage today' help.
- **take your time, slow down:** Respect pauses and don't interrupt the child – let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what's happened to them.
- **show you understand, reflect back:** Make it clear you're interested in what the child is telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.

In addition:

- Make a detailed note about what was said – do not paraphrase or use language like "the child used inappropriate language". You muct be specific
- Do not promise confidnntiality – you must pass the information on
- Gather evidence if there exists any more e.g. chat transcript, assignment

16 Reporting concerns

Safeguarding concerns about a child but be reported immediately via **Tute's secure, online form.**

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If you would like to talk about the concern, please contact the DSL or DDSL who will prioritise your query.

16.1　Process for reporting – Appendix B

The procedure to respond to a concern about a child is detailed in Appendix B. This process **must** be followed.

[The process summary can be found in OneDrive and must be bookmarked for quick access.](#)

16.2　Mandatory reporting - FGM

It is illegal to carry out FGM in the UK. It is also a criminal offence for UK nationals or permanent UK residents to perform FGM overseas or take their child abroad to have FGM carried out.

In England and Wales, regulated health and social care professionals and teachers **must make a report to the police**, if, in the course of their duties:

- they are informed by a child under the age of 18 that they have undergone an act of FGM
- they observe physical signs that an act of FGM may have been carried out on a child under the age of 18

In Wales, professionals who identify cases of FGM need to make a report to both the police and the local authority.

Do inform the DSL/DDSL of your actions.

If your concern does not fall into one of the above two bullet points, follow the procedure in Appendix B.

16.3　Absence reporting

Tute understands the importance of capturing, tracking and communication the session attendance and of all students.

We know that good attendance leads to improved outcomes, and we also understand that lack of attendance, particularly for disadvantaged children, can be a safeguarding concern.

What we do to support and manage attendance:

- Tute's platform captures attendance as on time, late or absent. If a student has not attended a lesson within 5 minutes of its start time, a nominated contact will receive an email informing them of absence allowing them the opportunity to contact the pupil/s and encourage attendance.

- Tute's platform also captures tutors' attendance and if they have not logged in to their lesson 10 minutes before its start time, Tute's admin team will receive a notification and will contact the tutor to ensure that they log in to the lesson as well as instruct a free teacher or staff member to access the lesson to ensure supervision. Tutors who do not attend sessions without good reason will be challenged and might be removed from the programme.
- Schools will have access to their students' attendance data via a comprehensive online dashboard to enable them to address issues.
- Tute also provides an attendance report in case schools do not access the dashboard. The above methods are successful in communicating the attendance information
- Teachers will also inform of a second non-attendance via a secure online form which will send the school contact an email to inform them
- Teachers and schools can discuss engagement strategies and, if needed, Tute can pause programmes until students can attend
- Tute will always work with all involved to ensure that students get the best out of sessions
- We will be very flexible in accommodating needs and will ensure that communication is maintained

16.4 Reporting absence

During a lesson, teachers must note the absence of a child.

If a child is absent for two consecutive lesson, teachers must complete a secure online form.

16.5 Making an allegation

If you have a concern about a colleague's behaviour and think that they are posing a safeguarding risk, you must report it. Consider that **it can happen here**.

To make an allegation, please see **Managing Allegations Policy**.

17 Sharing of Information

The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do, such

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as where safety may be at risk. Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children, if unsure staff should contact the DSL to discuss. Tute's DSL will share safeguarding concerns to schools / organisations with the schools / organisations appropriate DSL or link contact if not specified. The information will be completed on a Tute Incident Report and sent using secure encryption email.
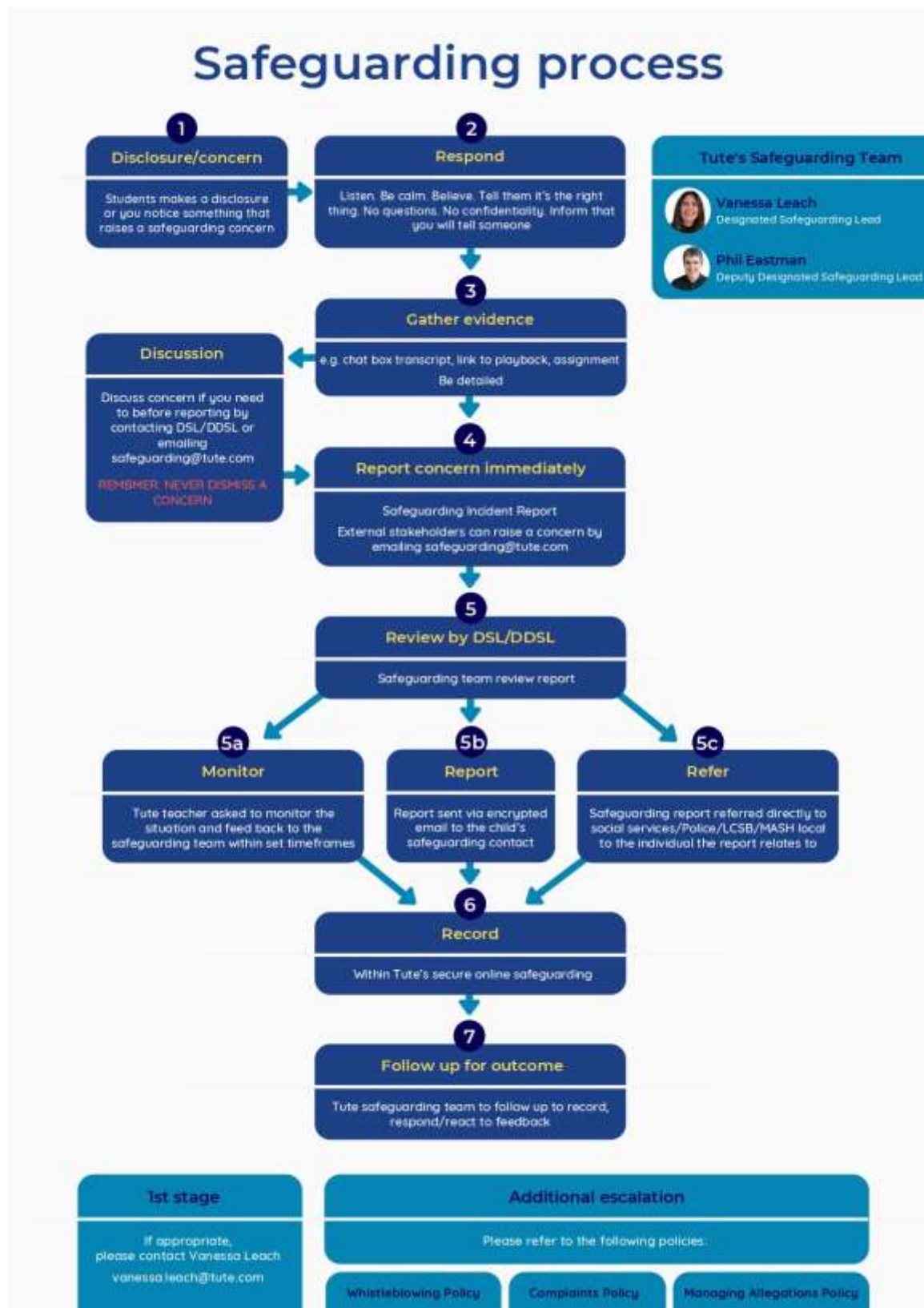
18 Multi Agency Working

Staff work in partnership with other agencies in the best interests of the children. If there are child protection concerns, referrals should be made by the DSL (or Deputy DSL) to the schools and or LAs DSL who will investigate Tute Education's concerns raised via the incident report and escalate further by taking the appropriate actions i.e. reporting to their local Safeguarding Partnerships.

19 Appendix A - Key Documentation, procedures and guidance

- Education Act 2002
- Keeping Children Safe in Education (2022)
- Working Together to Safeguard Children (2018)
- Data Protection Act (2018)
- What to do if you're worried a child is being abused (2015)
- Prevent Duty Guidance for England and Wales (2021)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Teachers Standards 2011
- Mandatory Reporting of Female Genital Mutilation – procedural information (2015)
- Sexual violence and sexual harassment between children in schools & colleges (2021)
- Children Act (1989)

20 Appendix B – Tute process for reporting

[Bookmark this document for quick access.](#)

Safeguarding process

1 Disclosure/concern
Students makes a disclosure or you notice something that raises a safeguarding concern

2 Respond
Listen. Be calm. Believe. Tell them it's the right thing. No questions. No confidentiality. Inform that you will tell someone

Tute's Safeguarding Team
Vanessa Leach – Designated Safeguarding Lead
Phil Eastman – Deputy Designated Safeguarding Lead

3 Gather evidence
e.g. chat box transcript, link to playback, assignment Be detailed

Discussion
Discuss concern if you need to before reporting by contacting DSL/DDSL or emailing safeguarding@tute.com
REMEMBER, NEVER DISMISS A CONCERN

4 Report concern immediately
Safeguarding Incident Report
External stakeholders can raise a concern by emailing safeguarding@tute.com

5 Review by DSL/DDSL
Safeguarding team review report

5a Monitor
Tute teacher asked to monitor the situation and feed back to the safeguarding team within set timeframes

5b Report
Report sent via encrypted email to the child's safeguarding contact

5c Refer
Safeguarding report referred directly to social services/Police/LCSB/MASH local to the individual the report relates to

6 Record
Within Tute's secure online safeguarding

7 Follow up for outcome
Tute safeguarding team to follow up to record, respond/react to feedback

1st stage
If appropriate, please contact Vanessa Leach vanessa.leach@tute.com

Additional escalation
Please refer to the following policies:
Whistleblowing Policy   Complaints Policy   Managing Allegations Policy

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21 Appendix C – Types of abuse

Abuse and neglect is defined as the maltreatment of a child or young person whereby someone may abuse or neglect a child by inflicting harm, or by failing to prevent harm.

They may be abused by an adult or adults or by another child or children. All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The following are the definitions of abuse and neglect as set out in Working Together to Safeguard Children (2018).

The ultimate responsibility to assess and define the type of abuse a child or young person may be subject to is that of the Police and Children's Services – our responsibility is to understand what each category of abuse is and how this can impact on the welfare and development of children and where we have concerns that a child or young person may be at risk of abuse and neglect (one or more categories can apply) to take appropriate action as early as possible.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur duringpregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to

	appropriate medical care or treatment. It may al<u></u>
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.	**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

22 Appendix D – Other safeguarding risks to children

In addition to the types of abuse described in Appendix B, there are other areas of safeguarding that the organisation has to be aware of. These include:

Child Sexual Exploitation (CSE) and Trafficking involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Child sexual exploitation does not always involve	**Female Genital Mutilation (FGM)** professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. (See Keeping Children Safe in Education Appendix A)

physical contact; it can also occur through the use of technology.	
All types of bullying including cyberbullying and sexting Tute has a separate Anti-Bullying policy.	**Forced marriage** is not the same as an arranged marriage, as it involves coercion and force and a marriage based on free choice. It affects both males and females.
Domestic violence, Gender-based violence/violence against women and girls (VAWG) and teenage relationship abuse involves any incident or pattern of incidents of controlling, coercive, threatening behavior, violence or abuse between those who are, or have been in relationships or family members regardless of gender or sexuality and is applicable to teenagers engaged in abusive relationships	**Gangs and youth violence**. Teachers and designated staff have a range of powers in relation to discipline to tackle problems, including violence, in the school environment. Such powers cover disciplinary actions, the power to restrain violent pupils, and the power to search pupils for prohibited items.
Drugs. As part of school's duty to promote pupils' wellbeing, we have a role to play in preventing drug misuse as part of our pastoral responsibilities (health and wellbeing/Healthy Schools) and to support the Governments drug strategy (2010) to provide information, advice and support to pupils via the curriculum	**Fabricated or induced illness.** This supplementary guidance Safeguarding Children in whom Illness is Fabricated or Induced (2008) sets out a national framework within which agencies and professionals at local level – individually and jointly – draw up and agree upon their own more detailed ways of working together where illness may be being fabricated or induced in a child by a carer who has parenting responsibilities for them

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Child and Adolescent Mental Health. Good mental health and resilience are fundamental to our children's physical health, relationships, education and to achieving their potential.

Faith abuse. The National Action Plan to Tackle Child Abuse Linked to Faith or Belief is intended to help raise awareness of the issue of child abuse linked to faith or belief and to encourage practical steps to be taken to prevent such abuse.

Radicalisation: The organisation is aware of its responsibilities under the Counter Terrorism and Security Act 2015, specifically Section 26, and the Prevent Strategy to safeguard pupils who are at risk of radicalisation by identifying and risk assessing individual who may be drawn into terrorism, violent or non-violent extremism. We provide a safe environment for our pupils to explore, understand and discuss sensitive topics including terrorism and extremist ideology. We use the curriculum and pastoral support to educate our pupils and to enable them to challenge these ideas. Staff are aware of the risk posed by other students and adults who may have been radicalised and the impact of radicalisation via social media. Staff have received appropriate training and have the knowledge and confidence to identify pupils at risk of being drawn into terrorism and extremism and challenge extremist ideals. Our IT filters are regularly reviewed in order to prevent access to

Private Fostering is essentially arrangements made privately for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. A relative, under the Children Act 1989, is a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break.

[Any School/Organisation] has a responsibility to refer to Children's Services any private fostering arrangement. Children's Services will undertake an assessment to ensure the needs and welfare

terrorist and extremist materials on line at the school.	of the child or young person is being met and that adults caring for them have access to advice and support.
Online Sexual Abuse The use of technology to manipulate, exploit, coerce or intimidate a child to (but not limited to): engage in sexual activity; produce sexual material/content; force a child to look at or watch sexual activities; encourage a child to behave in sexually inappropriate ways; or groom a child in preparation for sexual abuse (either online or offline). It can also involve directing others to, or coordinating, the abuse of children online. As with other forms of sexual abuse, online abuse can be misunderstood by the child and others as being consensual, occurring without the child's immediate recognition or understanding of abusive or exploitative conduct. In addition, fear of what might happen if they do not comply can also be a significant influencing factor. No child under the age of 18 can consent to being abused or exploited. Financial gain can be a feature of online child sexual abuse, it can involve serious organised crime and it can be carried out by either adults or peers.	**Attendance** Schools, including Academies and Free Schools, must monitor pupils' attendance through their daily register. Schools should agree with their local authority the intervals in which they will inform local authorities of the details of pupils who are regularly absent from school or have missed 10 school days or more without permission. Schools must also notify the authority if a pupil is to be deleted from the admission register in certain circumstances6. Pupils who remain on a school roll are not necessarily missing education but schools should monitor attendance and address it when it is poor. Schools also have safeguarding duties under section 175 of the Education Act 2002 in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. Where reasonably possible schools and colleges should hold more than one emergency contact number for their pupils and students.

Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.	**Serious Violence** All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs.

Additional information about key safeguarding areas can also be found in Keeping Children Safe in Education - Appendix A (2022).

23 Appendix E – Safeguarding crib sheet

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