

Trafford Tuition Safeguarding Policy

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1. Introduction

Trafford Tuition is a company created for the benefit of improving children's educational attainment. Its core activity is providing tutors for one to one and small group tuition to children in schools, remotely in schools and in appropriate environments such as community centres.

All children and young people have the right to learn in a safe and caring environment. This includes the right to protection from all types of abuse. All those in a position of trust who represent Trafford Tuition must do everything possible to foster these rights. To do this, certain protections need to be in place to safeguard children, as well as those who work with them. Trafford Tuition takes seriously its responsibility towards safeguarding all children who engage with the charity, with the focus being on their safety and welfare.

This policy is guided and referenced against the DfE's publication 'Keeping Children Safe in Education 2024' and the 'NSPCC Safeguarding and Child Protection for Tutors.'

Who does the Safeguarding Policy apply to?

Safeguarding and promoting the welfare of children applies to everyone who is representing or is subcontracted by Trafford Tuition. These include employees (full time and part time), tutors and volunteers. The Safeguarding Policy is available to all who represent Trafford Tuition, and all will be required to familiarise themselves with it. In addition, when Trafford Tuition enters a partnership with another organisation relating to work with children, the partner will be required to observe this Safeguarding Policy and any relevant guidance, and in turn, Trafford Tuition will receive a copy of the partner's policies.

2. Legal framework and related policies and procedures

This policy is complementary to several existing organisational policies and practices mentioned below. In general, where any reference is made to the physical world in these documents, this will apply in the same way in the online world, or as near to it as is reasonably foreseeable and possible.

- Keeping Children Safe in Education 2024 Part 1 (as a minimum)
- Safer Recruitment Policy
- Trafford Tuiton Complaints Policy
- Trafford Tuiton Guidance on Conduct and Behaviour

The following legislation informs and guides this Safeguarding policy, and the related organisational policies listed above:

- Keeping Children Safe in Education 2024
- Working together to safeguard children, 2018
- The Human Rights Act 1989
- The Children Act 1989 & 2004
- Data Protection Act 2018
- Guidance for Safer Working Practice for those working with children and young people in education settings (GSWP), May 2019 and the annexe issued in 2020

- The Domestic Abuse Act 2021
- Safeguarding Vulnerable Groups Act 2006
- Mandatory reporting of female genital mutilation (FGM) (Home office 2016)
- What to do if you're worried a child is being abuse: advice for practitioners. (DfE, 2015)
- Equality Act 2010
- Mental Health and behaviour in schools (DfE) 2018

3. Scope and Purpose of the Policy

General principles

Trafford Tuition acknowledges it has a responsibility for the safety of children receiving our services. It also recognises that good safeguarding policies and procedures are of benefit to everyone involved with our work, including staff, as they can help protect them from erroneous or malicious allegations.

All individuals who represent Trafford Tuition at all levels, must read and understand the following documents:

- Keeping Children Safe in Education 2024 Part 1 (as a minimum)
- Safer Recruitment Policy
- Trafford Tuition DBS Policy
- Trafford Tuition Complaints Policy
- Trafford Tuition Guidance on Conduct and Behaviour

The purpose of the Safeguarding Policy is to establish an environment in which the children with whom Trafford Tuition personnel come into direct or indirect contact are protected from abuse, are safe and are treated with dignity, and to create an atmosphere in which children feel able to discuss openly any

concerns they may have or any circumstances which may constitute abuse. The Safeguarding Policy seeks to achieve this by setting out a series of behavioural guidelines and a management structure to implement the policy. Trafford Tuition is committed to providing a safe environment for children:

- The child's welfare is paramount.
- All children whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity, have the right to protection from abuse.
- All suspicions and allegations of inappropriate behaviour will be taken seriously and responded to swiftly and appropriately.
- As defined in 'Keeping Children Safe in Education 2024', anyone under the age of 18 years is considered to be a child.

Trafford Tuition is committed to practices which promote the welfare of children and protect children from harm. Trafford Tuition acknowledges that representatives of the organisation may deliver tuition to some of the most vulnerable children in society such as Looked after Children.

All staff who have supervised or unsupervised access to or contact with children are required to:

- Recognise and accept their responsibilities.
- Develop awareness of the issues which can cause children harm, such as the impact of Mental Health issues, as documented in 'Keeping Children Safe in Education 2024'.
- Report concerns following the procedures laid out within this policy.

Trafford Tuition will endeavour to safeguard children by:

- Reporting concerns to the appropriate authorities.
- Ensuring that safeguarding and child protection is promoted throughout the organisation.

4. Conduct and Behaviour (Code of Conduct)

For further guidance on in-person and online conduct and behaviour please read 'Trafford Tuition Guidance on Conduct and Behaviour'.

5. Roles and Responsibilities

Designated Safeguarding Lead (DSL)

Trafford Tuition is founded and coordinated by a trained Designated Safeguarding Lead (DSL) who is responsible for dealing with any concerns about the protection of children. The DSL is Safeguarding Level 3 trained (renewed every two years) and has completed Prevent Training.

6. Reporting and Referral Process

Anyone associated with Trafford Tuition could have their suspicion or concern raised in a number of ways, the most likely but not exhaustive of which are:

1. The conduct of a member of staff or tutor.
2. A child "disclosing" abuse.
3. Bruising or evidence of physical hurt.
4. Unusual behaviour by a child.
5. Overhearing a child's conversation with another child.

Where a tutor who is working on behalf of Trafford Tuition has a concern whilst providing tuition in a school, online, community centre or any other place for tuition that has been arranged by Trafford Tuition, the tutor must contact in the first instance the Designated Safeguarding Lead (or equivalent) at the relevant location.

The information for who to inform is supplied before tuition begins, at the Introductory Meeting, which involves both the school (or equivalent) and a Trafford Tuition representative.

Tutors will be guided by the setting's Safeguarding/Child Protection policies.

The Tutor must then inform the Trafford Tuition DSL in the following way:

- Concerns about a specific child should be reported immediately in person or by telephone and confirmed in writing. Delay could prejudice the welfare of a child.
 - Responding to low-level concerns – the information collected by the DSL will help them to categorise the type of behaviour and determine what further action may need to be taken.
 - All safeguarding concerns (and outcomes) are logged and recorded on a central, encrypted safeguarding log.
- If the concerns relate to the conduct of a member of staff or tutor these should be reported in person or by phone to the DSL immediately. If the concern is about the DSL, then report to the Local Authority.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in Trafford Tuition's safeguarding regime and know that such concerns will be taken seriously by the DSL.

Where a staff member feels unable to raise an issue with the DSL or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them: Staff or tutors can call the NSPCC on 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) and email them at help@nspcc.org.uk.

Responding Appropriately to a Child Making an Allegation of Abuse

1. Stay calm.
2. Listen carefully to what is said.
3. Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
4. Tell the child that the matter will only be disclosed to those who need to know about it.
5. Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
6. Reassure the child that they have done the right thing in telling you.

7. Tell them what you will do next, and with whom the information will be shared.
8. Record in writing what was said, using the child's own words, as soon as possible – note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated.
9. It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. That is a task for the professional child protection agencies, following a referral from the Designated Safeguarding Lead within the organisation.
10. Report to the setting's Designated Safeguarding Lead (or equivalent) as soon as is practically possible.
11. Report concern to Trafford Tuition's DSL as soon as is practically possible, who will complete Appendix A.

7. Safeguarding Training

Trafford Tuition ensures that tutors have undertaken and completed the relevant training prior to placement in their role.

This must cover as a minimum:

- Safeguarding and Child Protection – tutors complete training supplied by the NSPCC.
- Prevent Duty – This must be completed in addition to the requirements set out in the Safer recruitment policies within Keeping Children Safe in Education mandatory guidance, as set out further in this document.
- Annual refresher training is compulsory for all returning tutors, the training incorporates all relevant changes to KCSIE for that academic year.

8. Safeguarding definitions

The definition of the term 'safeguarding' as derived in this policy is taken from statutory guidance. Safeguarding children is defined as:

- protecting children from maltreatment

- preventing the 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

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, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Definitions of the four categories of abuse:

1. Physical abuse – a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
2. Sexual child abuse – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. Activities may involve physical contact or non-penetrative acts. Can take place online and technology can be used to facilitate abuse. Sexual abuse of children by other children and women is possible, it is not solely perpetrated by adult males (Rape, molestation, child pornography production and possession, masturbation, kissing, rubbing, grooming, encouraging children to behave in sexually inappropriate ways).
3. 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 (Physical neglect, educational neglect, and emotional neglect).

4. Emotional abuse – 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 (verbal, mental, or psychological abuse). The signs of child abuse aren't always obvious, and a child may not be ready or able to disclose abuse (they may feel embarrassed or humiliated or are being threatened). Sometimes, children don't even realise that what's happening to them is abuse. That should not prevent staff or tutors from speaking to the DSL if they have concerns.

Some common indicators that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious or depressed
- becoming uncharacteristically aggressive
- physical marks/injuries (burns, scars, fractures)
- lacks social skills and has few friends if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body
- malnutrition or unexplained weight loss.

These signs don't necessarily mean that a child is being abused, (there could be other things happening in their life which are affecting their behaviour) but they should be monitored and any concerns reported. There may also be some concerning behaviour from adults who have children in their care, which raises concerns for the child/children's safety and wellbeing.

Key topics given greater emphasis in recent KCSiE updates include Domestic abuse (and the Domestic Abuse Act 2021), Child on Child abuse, Serious Violence and 'Honour' – based abuse:

Domestic Abuse (excerpt take from ‘Keeping Children Safe in Education 2024’)

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, sexual, emotional and economic abuse and coercive and controlling behaviour. It may be a single incident or a pattern of incidents. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can be victims of domestic abuse – they may witness, and be adversely affected by, domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and their health, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’.

Child on Child Abuse (excerpt taken from ‘Keeping Children Safe in Education 2024’)

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It can happen both inside and outside of school and online. It is important that all staff and tutors recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between children (sometimes known as

‘teenage relationship abuse’); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse); sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery); causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting (which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm) and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Serious Violence and Child Criminal Exploitation (CCE) (excerpt take from ‘Keeping Children Safe in Education 2024’)

Tutors should be aware of the indicators which may signal children are at risk from, or are involved with, serious violent crime; increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs (including county lines) and may be at risk of criminal exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK.

Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

'Honour'-based abuse (including Female Genital Mutilation and Forced Marriage) (excerpt take from 'Keeping Children Safe in Education 2024')

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Definitions of the ten categories of abuse, including signs and symptoms relevant to children and adults as per statutory guidance:

1. Physical abuse
2. Domestic violence or abuse
3. Sexual abuse
4. Psychological or emotional abuse
5. Financial or material abuse
6. Modern slavery
7. Discriminatory abuse
8. Organisational or institutional abuse
9. Neglect or acts of omission
10. Self-neglect

The terms 'victim' and 'perpetrator' are widely recognised and understood but it is important to recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, Tutor Trust staff and tutors should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. In some instances, the abusive behaviour will have been harmful to the perpetrator as well so it is important to think about terminology, particularly when speaking in front of children.

9. Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for The Tutor Trust to recognise the importance of information sharing between practitioners and local agencies. The Tutor Trust is proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. The Tutor Trust is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. *Further

details regarding Information Sharing and Data Protection are held within The Tutor Trust Data Protection Policy and Privacy Notices. They are available to staff, tutors and trustees at all times.

10. Change of Employee/Tutor Circumstances and Personal Information

Changes in Personal Information

It is important that our records are correct, as inaccurate or out of date information may affect your salary or wage or cause difficulties in situations where contact is required for emergencies. Tutors, Staff and volunteers must notify The Tutor Trust (as appropriate) immediately of all changes in the following personal information. Staff must inform the DSL of any changes immediately. Both are a requirement of the signed Self-Declaration and Disclosure Form held on file for each Tutor or Volunteer:

- Name
- Home address
- Telephone number
- Bank account details
- Examinations passed/qualifications gained
- Emergency contact
- Criminal charge, arrest, caution or conviction
- Conflict, or potential conflict of interest

Personal data on Tutors, Staff and volunteers is held in accordance with the provisions of the Company's Data Protection Policy which will be made available for inspection by you if required.

Appendix A – Form for Reporting Child Protection Concerns

CONFIDENTIAL Where a referral is made, this form will be sent to the appropriate services as a written confirmation of the referral with a copy retained by the DSL.

Name of child

Age if known

Date School/address

What prompts your concerns? Please be specific and include the dates and times of any incidents

Were there any physical or behavioural signs?

Any other causes for concern?

Have you spoken to the child?

If so, what was said?

Have you spoken to the child's parents/carers?

If so, what was said?

Has anybody been alleged to be the abuser? If so, give details.

Please give your name and contact details.

Signature

Today's date

This form must be completed and given in a sealed envelope marked "Private & Confidential", to the Designated Safeguarding Lead.