



Safeguarding and Child Protection Policy 2023

| Responsible for review of the Policy | Date of Approval | Date of Review (annual) |
|--------------------------------------|------------------|-------------------------|
| Fay Morris DSL | | |
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Contents

| | | |
|------------|--|---------|
| 1 | Policy, Principles, and Scope | Page 3 |
| 2 | Key contacts if you have a concern | Page 5 |
| 3 | Legal requirements and statutory guidance | Page 6 |
| 4 | How to recognise indicators of harm or abuse | Page 7 |
| 5 | Safer recruitment and induction | Page 11 |
| 6 | Online safety | Page 12 |
| 7 | How to respond and record an incident of harm or abuse | Page 13 |
| 8 | Whistleblowing | Page 14 |
| 9 | How to handle allegations made against staff | Page 14 |
| 10 | Lower-level concerns | Page 15 |
| 11 | Disclosure and Barring Service | Page 15 |
| 12 | Confidentiality and record retention | Page 16 |
| 13 | Other relevant policies and procedures | Page 16 |
| Appendix 1 | Procedure – how to report an incident of harm or abuse | Page 18 |
| Appendix 2 | Procedure – how to report allegations made against staff | Page 19 |
| Appendix 3 | Referral Form | Page 20 |

1 Policy, Principles, and Scope

- 1.1 'Children have the right to be protected from all forms of violence (physical and mental). They must be kept safe from harm and they must be given proper care by those looking after them.' (United Nations Convention on the Rights of the Child Article 19).
- 1.2 We create a high quality, specialised service delivered across Cornwall that provides unique and bespoke tuition to help re-engage students. We are a team of trauma informed tutors who work together to create a positive learning environment where students feel safe and calm. We support students on a one-to-one basis or in small groups to develop positive emotions linked to learning. We adapt to the pace as needed and in accordance with other professional recommendations. We encourage students to successfully and confidently reintegrate and maintain a place in their preferred education setting.
- 1.3 We are committed to providing a safe environment for everyone where the welfare of our students remains the paramount consideration in all aspects of our work.
- 1.4 We acknowledge that we deliver tuition to some of the most vulnerable children in our society and we believe all children whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity, have the right to be protected from harm and abuse.
- 1.5 We understand how to implement good safeguarding practice in our roles. We know how to respond appropriately where we are worried that a child may be at risk of harm or abuse.
- 1.6 This policy applies to anyone working on behalf of Kernow Tuition including the senior manager, staff, volunteers, and students.

- 1.7 Everyone working in the organisation must read, understand, and provide a signature to say they agree to work under this Policy. They are issued with this Safeguarding and Child Protection Policy; and Keeping Children Safe in Education, Part 1 and Annex A.
- 1.8 We will support our students by:
- 1.8.1 Creating a positive and secure learning environment that puts children first
 - 1.8.2 Making a commitment that under no circumstances should any staff member or volunteer inflict physical or psychological harm on a child
 - 1.8.3 Ensuring that children feel listened to and valued
 - 1.8.4 Recognising that safeguarding children is everyone's responsibility, not just those who work with children
 - 1.8.5 Keeping child protection issues at the forefront of our work, and understanding that this policy and our Codes of Conduct apply equally for online and in-person learning
 - 1.8.6 knowing how to contact the Designated Safeguarding Lead.
 - 1.8.7 Recognising the additional needs of children from minority ethnic groups, children in care and disabled children and the barriers they may face
 - 1.8.8 Carefully recruiting and selecting staff members, contractors, and volunteers in accordance with safer recruitment principles and checking the suitability of all staff members
 - 1.8.9 Taking seriously all complaints and concerns about poor practice or suspected or actual child abuse and responding swiftly in a reasonable and proportionate way
 - 1.8.10 Following procedures where a concern is raised about staff or volunteers who work with children
 - 1.8.11 Sharing information promptly about concerns with statutory agencies who need to know, and involving parents/carers and children where appropriate to do so
 - 1.8.12 Working effectively with our partners in education to make sure we maintain high standards of safeguarding practice

1.9 All cases raised under this policy will be dealt with in a prompt, consistent, fair, and transparent manner. Everyone involved in the process is expected to work together to resolve the concern and maintain confidentiality.

1.10 As defined in DfE Keeping Children Safe in Education 2023, anyone under the age of 18 years is considered to be a child.

2 Key Contacts if you have a concern

2.1 The Designated Safeguarding Lead (DSL) is the main point of contact for any concern arising under this Policy. Deputy Safeguarding Lead is Rebecca Olive and her contact details can be found within the tuition centre.

| | |
|-------------------|---|
| Safeguarding Lead | Fay Morris (Kernow Tuition Manager & Owner) |
| Telephone Number | 01637 873862 07891126223 |
| Email | learn@kernowtuition.co.uk |
| Address | Kernow Tuition Centre, 12 Chi Teyrdelen, Stret Dor Wartha, Nansledan, TR8 4RT. |

2.2 The role of the DSL is to:

2.2.1 Provide advice and support on student welfare, child protection and safeguarding matters

2.2.2 Ensure staff compliance with Kernow Tuition's safeguarding and child protection procedures and provide a signature to say they have read and understood and agree to work within this Policy, the Code of Conduct and Keeping Children Safe in Education Part 1 and annex A

- 2.2.3 Organise child protection and safeguarding induction, training and provide regular updates to staff/volunteers
- 2.2.4 Refer suspected cases, as appropriate, to statutory agencies including the local authority/police/designated officer (LADO) in a timely manner
- 2.2.5 Take part in multi-disciplinary meetings including strategy discussions and/or support staff to do so
- 2.2.6 Contribute to the assessment of children
- 2.2.7 Ensure that accurate, relevant, and timely records are kept in a secure and confidential manner.

2.3 Our Safeguarding Children Partnership (OSCP) for Cornwall and the Isles of Scilly
<https://ciossafeguarding.org.uk/scp>

2.4 Reporting a concern if worried about a child – [Cornwall and the Isles of Scilly Safeguarding Children Partnership - Worried about a child \(ciossafeguarding.org.uk\)](#)
 contact:

| | Contact | Telephone Number |
|-------|--|---|
| 2.4.1 | Cornwall – Multi-agency Referral Unit | 0300 123 1116 or Out of Hours Service; 01208 251300 |
| 2.4.2 | Isles of Scilly – Children’s Social Care | 01720 424483 or Out of Hours Service; 01720 422699 |
| 2.4.3 | Police | 101 |
| 2.4.4 | If you have a concern about a professional or volunteer working with children – contact the Local Authority Designated Officer (LADO | 01872 326536 |

3 Legal Requirements and statutory guidance

3.1 The main legal requirements to meet our duties under this Policy are set out in the following documents:

- 3.2 Keeping Children Safe in Education (2023) including how to keep children safe online (Annex D) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
 - 3.3 After-school clubs, community activities, and tuition- safeguarding guidance [After-school clubs, community activities, and tuition - safeguarding guidance for providers \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/81121/after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers.pdf)
 - 3.4 Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/contents>
 - 3.5 Working Together to Safeguard Children (2018) <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
 - 3.6 Sexual Offences Act 2003 <https://www.legislation.gov.uk/ukpga/2003/42/section/22A>
 - 3.7 Filtering and Monitoring Standards <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>
 - 3.8 What to do if you're worried <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
 - 3.9 Information sharing (2018) <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- 4 How to **recognise** Indicators of abuse and harm
- 4.1 **Physical abuse:** may involve hitting, shaking, throwing, poisoning, burning/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
 - 4.2 **Emotional abuse:** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development it may involve conveying to children 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 and how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability as well as over protection 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 cyber bullying 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 though it may occur alone

- 4.3 **Sexual abuse:** any act which involves forcing or enticing a child to take part in sexual activities. 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. Sexual abuse can take place on line, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males women can also commit acts of sexual abuse as can other children
- 4.4 **Sexual violence and sexual harassment between children:** this can occur between two children of any age and sex it can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All victims must be taken seriously supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting the abuse reports of sexual assault and harassment are extremely complex and it is essential that victims are protected. Part 5 keeping children safe in education clearly outlines the response that should be taken.
- 4.5 **Child sexual exploitation:** a form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange of something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity

appears to be consensual. Child sexual exploitation can also take place through the use of technology, known as 'technology assisted abuse.'

- 4.6 **County lines/Child Criminal Exploitation:** the organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using children gangs recruit children at risk through deception intimidation violence debt bondage or grooming. Gangs also use local property as a base for their activities and this often involves taking over the home over an adult who is unable to challenge them county line gangs pose a significant threat to children young people and adults upon whom they rely on to conduct and or facilitate such criminality.
- 4.7 **Neglect and acts of omission** ongoing failure to meet the basic needs of children young people and adults neglect may involve failing to provide adequate nutrition or shelter including exclusion from home or abandonment failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care treatment and education it may also include neglect of or unresponsiveness to basic emotional needs
- 4.8 **Grooming:** the process of developing a relationship with and the trust of an individual and sometimes their family to exploit abuse or traffic them grooming can happen both online and in person
- 4.9 **Radicalisation:** the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children for the purposes of involvement in extremist activity is a serious safeguarding issue.
- 4.10 **Female genital mutilation FGM:** involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act 2003 makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.
- 4.11 **Bullying:** repeated behaviour intended to intimidate or upset someone and or make them feel uncomfortable or unsafe. For example, name calling exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers,

threatening to cause harm, physically hurting someone or damaging their possessions.

- 4.12 **Cyberbullying:** the use of technology to harass, threaten, embarrass, humiliate, spread rumours, or target another person. It includes the impact of new technologies on sexual behaviour. For example, sexting and ‘up-skirting.’
- 4.13 **Poor practise:** this is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practise is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practise can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practise occur when the needs of children are not afforded the necessary priority compromising their welfare. For example, allowing abusive or concerning practises to go unreported, placing children in potentially compromising and uncomfortable situations, failing to ensure the safety of children, ignoring health and safety guidelines or giving continued and unnecessary preferential treatment to individuals. Staff going into organisations should challenge poor practise and inform the DSL.
- 4.14 **Contextual Safeguarding:** safeguarding incidents can be associated with factors outside of education. All staff should be considering the context within which such incidents or behaviours occur. This is known as contextual safeguarding which simply means assessing children within their wider environmental factors to see whether there is a threat to their safety or welfare. It can include child sexual exploitation child criminal exploitation serious violence and gang culture. Any concerns should be raised with the DSL.
- 4.15 **Child on child abuse:** any form of physical, sexual, emotional and financial abuse and coercive control exercised between individuals and within relationships, both intimate and non-intimate and can take place physically or online.
- 4.16 **Infatuations:** children and adults may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances there is a high risk that words or actions may be misinterpreted and that allegations could be made against staff. They should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a child or adult may

be infatuated with them or with a colleague should discuss this at the earliest opportunity with the DSL.

- 4.17 **Domestic violence:** any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so-called 'honour based' violence.
- 4.18 **Mental health and wellbeing:** staff should be aware that in some cases, mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to diagnose a mental health problem. Staff however are well placed to notice any changes in a child's behaviour that may indicate they are developing or experiencing a mental health problem. Where children have experienced abuse or neglect or other traumatic adverse childhood experiences this can have a lasting impact throughout their childhood adolescence and into adulthood it is key that staff are aware of how these children's experiences can impact on their mental health behaviour and education. If staff have a mental health concern about a child that they think may be a safeguarding concern they should talk to the DSL.
- 4.19 **Children with special educational needs and disabilities (SEND) and/or LGBTQ:** Children with special educational needs and disabilities can face additional safeguarding challenges. Additional barriers can exist when identifying abuse and neglect in this group of children these can include
- 4.19.1 assumptions that indicators of possible abuse such as behaviour mood and injury relate to the child's disability without further exploration
 - 4.19.2 The potential for children with SEND and disabilities being disproportionately impacted by behaviours such as bullying without outwardly showing any signs and being more prone to being isolated from their peers than other children and
 - 4.19.3 communication barriers and difficulties in overcoming these barriers
 - 4.19.4 Child who may be LGBTQ is not in itself an inherent risk factor for harm. However it may increase their vulnerability to being targeted by other children whether they are identifying themselves or whether they are perceived by

others to be LGBTQ. All staff need to be able to minimise any additional barriers they may face and provide a safe place for them to share concerns.

4.20 **Managing concerns raised about staff or volunteers who may pose a risk of harm to children- lower- level concern policy**

5 Safer Recruitment and Induction

5.1 We are committed to Safer Recruitment procedures which include

- 5.1.1 Ensuring recruiters and interviewers are appropriately trained and supported
- 5.1.2 Fair and thorough application processes to select the most suitable person for the job in respect of abilities and qualifications in line with equal opportunities.
- 5.1.3 Pre-recruitment checks which include identity verification, online searches on short-listed candidates, references and all staff working with children will be subject to an enhanced DBS check
- 5.1.4 Providing effective supervision, training and support. For example, monthly one to one tutor and Manager meetings to discuss students' provision, workforce plan, 6 monthly performance review
- 5.1.5 safeguarding training is a mandatory element of all inductions for staff and tutors and this knowledge is refreshed on an annual basis and reinforced regularly via bulletins and staff meetings to make sure that they can carry out the objectives of this policy.

6 Online Safety

- 6.1 We recognise that online safety is part of our core business. We aim to protect staff, tutors and students in their use of technology, and specifically, during tuition sessions.
- 6.2 Our approach to online safety is based on being mindful of the following categories of risk:
 - 6.2.1 Content - Being exposed to illegal inappropriate or harmful content such as pornography, fake news, racism, misogyny self-harm, suicide, anti-Semitism radicalisation and extremism

- 6.2.2 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
- 6.2.3 Conduct- personal online behaviour that increases the likelihood of, or causes harm such as making sending and receiving explicit images (eg. consensual and non-consensual sharing of nudes and semi nudes and/or pornography), sharing other explicit images and online bullying; and
- 6.2.4 Commerce- risks such as online gambling, inappropriate advertising, phishing and/or financial scams

7 How to **respond and record** a disclosure of abuse or harm

- 7.1 When working alongside a commissioning organisation eg. a school or college, disclosures from or relating to children should be managed in line with that organisation's Safeguarding and Child Protection Policy. However, the following guidelines should be followed where:
 - 7.1.1 There is no member of the commissioning organisation present; and/or
 - 7.1.2 You believe that the response from the commissioning organisation is inadequate; and/or
 - 7.1.3 We are providing a direct service to children
- 7.2 If a child discloses that they have been abused or are at risk of abuse, you must ensure that the child's immediate needs are met and prioritise their safety and protection from further abuse all else. It is important to remember that, while it is your responsibility to be a supportive listener and to refer the information to the DSL, it is not your role to counsel the child or investigate their claims.
- 7.3 You should:
 - 7.3.1 Listen to and believe them allow them time to talk freely and do not ask leading questions
 - 7.3.2 stay calm and do not show that you are shocked or upset

- 7.3.3 tell them they have done the right thing in telling you do not tell them that they should have told you sooner
- 7.3.4 explain what will happen next and that you will have to pass this information on do not promise to keep it a secret
- 7.3.5 do not communicate with the alleged abuser
- 7.3.6 follow this policy and procedure and report all concerns and disclosures immediately to the DSL
- 7.3.7 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 stick to the facts and do not put your own judgement on it then pass it on to the DSL
- 7.3.8 Alternatively, if appropriate make a referral to children social care and/or the police directly and tell the DSL as soon as possible that you have done so
- 7.3.9 bear in mind that some children may
- 7.3.10 not feel ready or know how to tell someone that they are being abused exploited or neglected
- 7.3.11 not recognise their experience is harmful
- 7.3.12 feel embarrassed humiliated or threatened this could be due to their vulnerability disability sexual orientation and or language barrier
- 7.4 None of this should stop you from having a professional curiosity and speaking to the DSL if you have concerns about a child

8 Whistleblowing

- 8.1 We understand that part of creating a safe environment for children is to enable staff and tutors to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in our safeguarding arrangements. If it becomes necessary to consult outside the organisation, staff can follow the Whistleblowing Policy which advises staff to speak to the DSL and if the concern is about the DSL, to the Deputy DSL.

9 How to Handle Allegations against Staff

- 9.1 We recognise that any complaints, concerns or allegations made against staff, tutors, contractors or volunteers must be taken seriously.
- 9.2 We expect everyone to comply with the relevant Code of Conduct when performing their role in order to promote safer working practices.
- 9.3 We will listen and respond to complaints in accordance with the Complaints policy and procedure to ensure that students, parents and other professionals are confident about the service we provide.
- 9.4 In the event that a staff member has a concern that an adult working with children has acted in the following ways a referral should be made to the DSL who consider that the threshold of harm is met to contact the local authority designated officer for children where the adult has
 - 9.4.1 behaved in a way that has harmed or may have harmed a child
 - 9.4.2 possibly committed a criminal offence against or related to a child
 - 9.4.3 behaved towards a child in a way that indicates they may pose a risk of harm
 - 9.4.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 9.5 The LADO is responsible for management and oversight of all child protection allegations made against staff and volunteers who work with children. They may also be known as the designated person with local authority social care.
- 9.6 Where there are concerns for the safety or well-being of a child, contact should be made with the DSL and a referral should be made to the relevant local authority children's social care. Where possible, parents/carers should be informed unless to do so would place the child at risk.
- 9.7 Referrals can be made by telephone but must always be followed up in writing
- 9.8 if there is immediate threat of harm the police should be contacted

10 Lower-level concerns

- 10.1 The term 'lower-level concerns' relates to any concerns – no matter how small- that a adult may have acted in a way that

10.1.1 Is inconsistent with our values, including inappropriate conduct outside of work, and

10.1.2 Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

10.2 We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share lower-level concerns so that they can be addressed appropriately under a separate policy and procedure or by DSL.

11 Disclosure and Barring Service (DBS)

11.1 The duty to refer to the DBS is met when an employer has dismissed or removed a person from regulated activity defined in the safeguarding children and adults at risk act as amended by the protection of freedoms act or would or may have if the person had not left resigned retired been made redundant or moved to another position because the person has

11.2 been cautioned or convicted for a relevant offence (a relevant offence for the purposes of referrals to the DBS is an offence that would result in the individual's automatic inclusion in the children's or adults barred list

11.3 engaged in relevant conduct which endangers or is likely to endanger children young people and adults at risk

11.4 satisfied the harm test the harm test is met when an employer believes that an individual may harm may cause to be harmed may put at risk of harm may attempt to harm or may incite another person to harm a child young person or adult at risk

11.5 referrals to the DBS should be made once investigations and disciplinary processes are complete even if the person has left employment referrals must be made even if a significant. Has passed between the allegation and the gathering of evidence to support a decision to make a referral

12 Confidentiality and record retention

- 12.1 All records will be retained in line with GDPR (General Data Protection Regulations) and Data Protection Act 2018 requirements which place a duty upon us to process personal information fairly and lawfully and to keep the information safe and secure.
- 12.2 However, we recognise the importance of information sharing with statutory agencies where there are suspected safeguarding and child protection concerns and that the GDPR does not prevent the sharing of information to keep children safe.

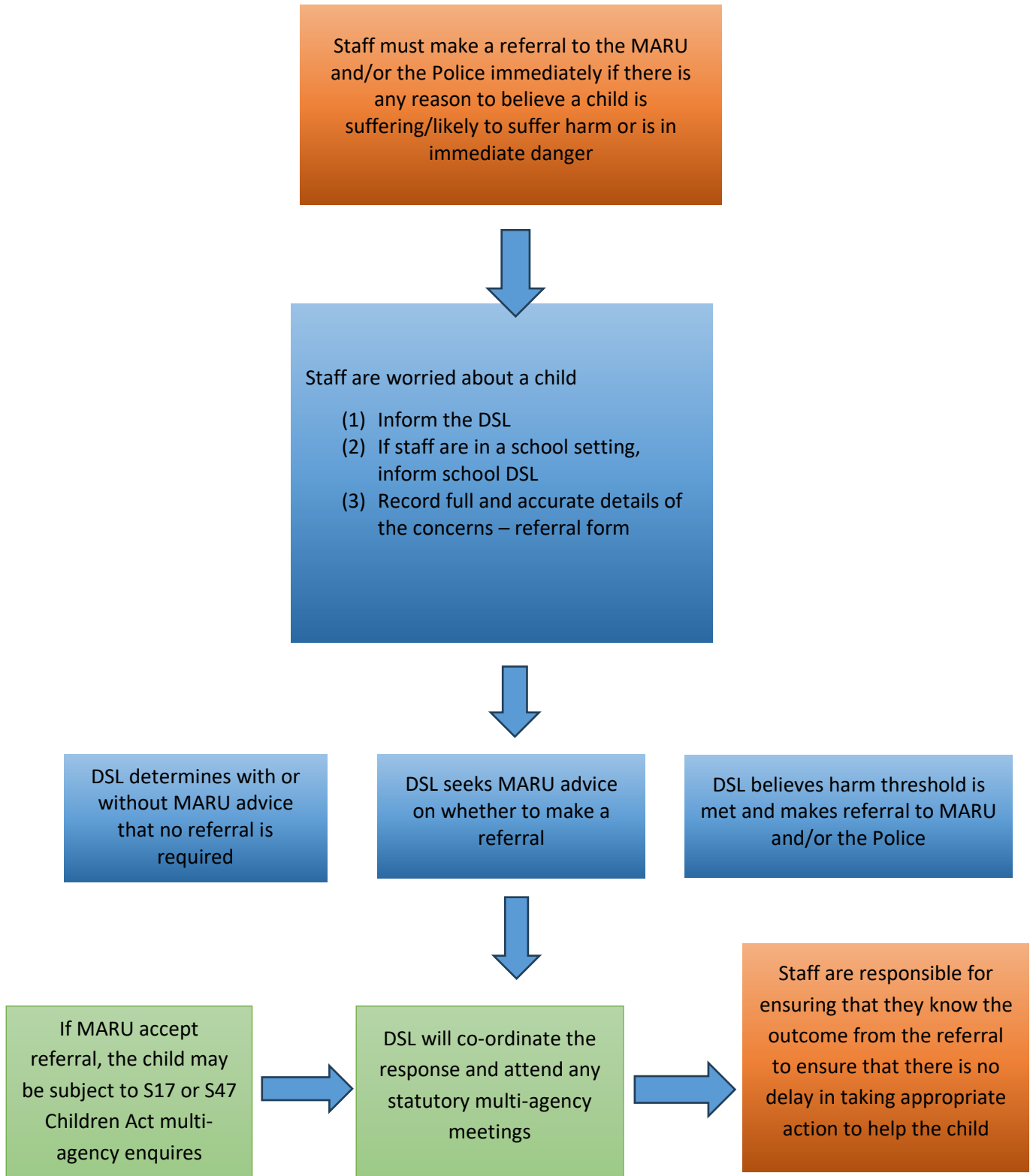
13 Other relevant policies and procedures

- Anti bullying policy
- Capability policy
- Acceptable phone use policy
- Grievance policy
- Codes of conduct for staff
- Expectations from staff and parents/children agreement
- Lower-level Concern Policy and procedure
- Disciplinary Policy and Procedures
- Whistleblowing Policy
- Complaints Policy and Procedure
- Equality and Diversity Policy
- Photography and sharing images – parental consent
- Lone working policy and procedure

Appendix 1

Procedure Flowchart

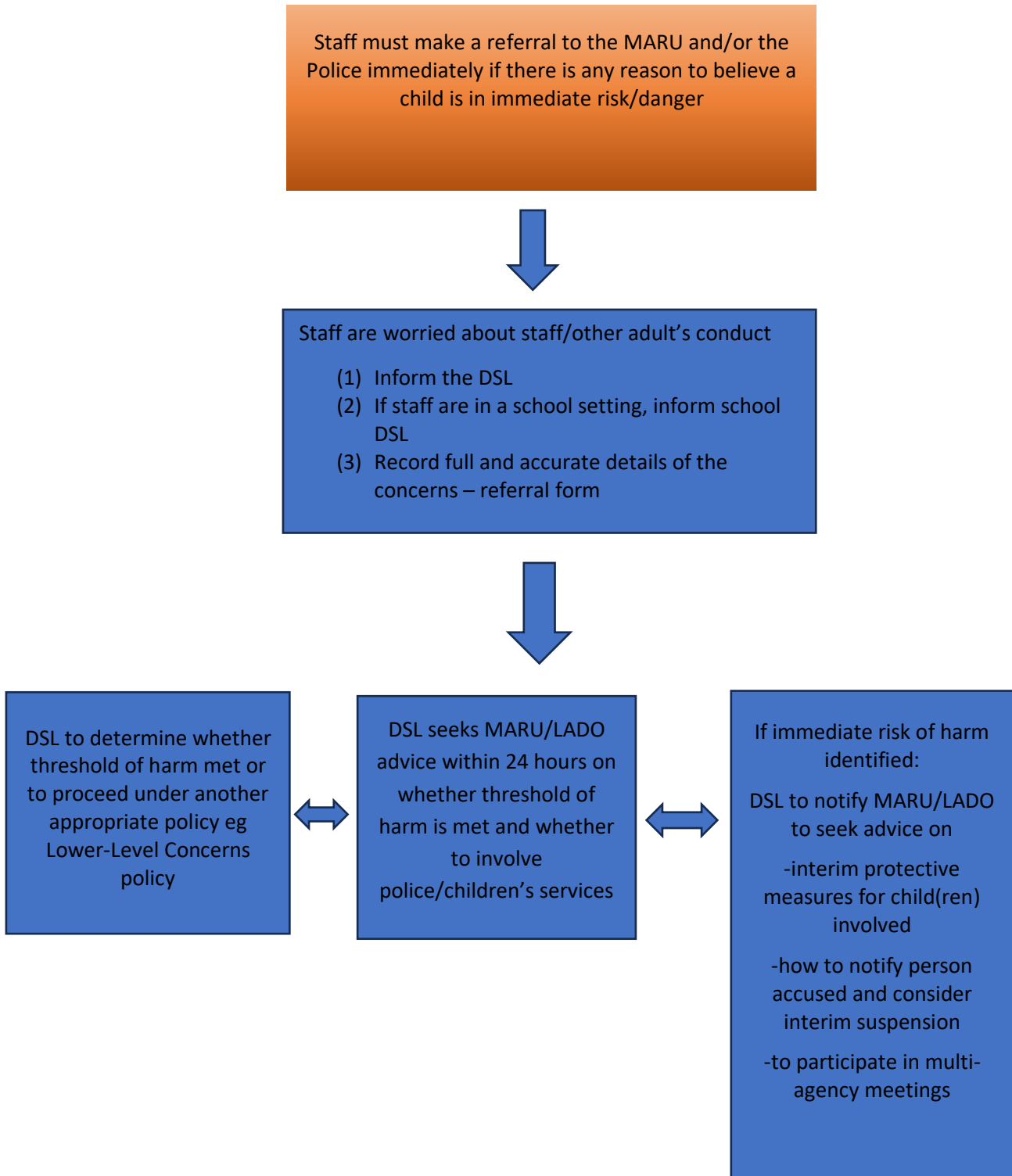
How to **report** an incident of harm or abuse in respect of a child



Appendix 2

Procedure Flowchart

How to **report** allegations made against staff



Appendix 3 Referral Form

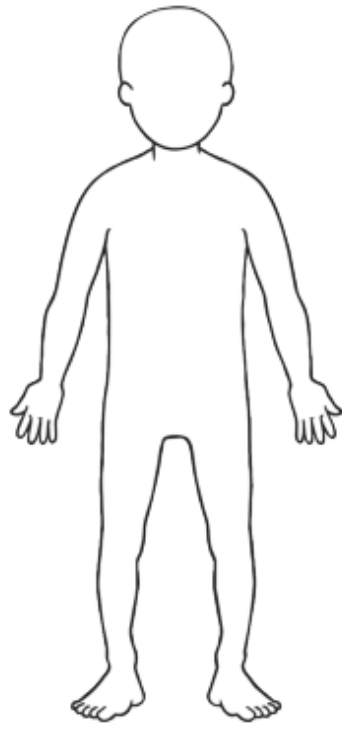
Safeguarding

| Safeguarding Concerns Record Form | | | |
|-----------------------------------|--|-----------------------|--|
| Child's name | | Child's date of birth | |
| Current class | | Current year group | |

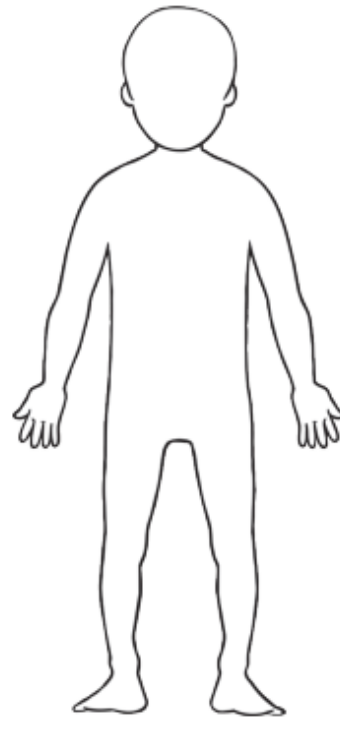
Concerns about the child:

Voice of the child:

Body map:



Front



Back

Actions taken:

| | | | |
|------------------------------------|--|------|--|
| Name of adult filling in this form | | | |
| Signature | | | |
| Date | | Time | |



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