Safeguarding and Child Protection Policy & Procedures

SEND TUITION • 2026 EDITION

Document owner	Send Tuition management
Designated Safeguarding Lead (DSL)	Gemma Rowbotham
Deputy DSL	Elaine Roberts
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1. Purpose, scope and safeguarding commitment

Send Tuition is committed to safeguarding and promoting the welfare of children and young people under 18 across in-person tuition, mentoring, home visits, school and community settings, trips, online tuition and approved online activities. Safeguarding is everyone's responsibility. The welfare and wishes of the child are central to decisions, with appropriate action taken to protect children from harm.

This policy applies to directors, employees, tutors, mentors, agency workers, volunteers and contractors. It is also shared with families, schools and commissioning bodies. All personnel must read it, follow the Code of Conduct and relevant host-setting procedures, and complete the training required for their role.

The policy draws on Working Together to Safeguard Children 2026 and, where applicable to school/college provision or contractual arrangements, Keeping Children Safe in Education 2026 (KCSIE). KCSIE statutory duties do not automatically apply to every independent tutoring arrangement; Send Tuition nevertheless adopts relevant safeguarding standards as organisational practice.

2. Safeguarding contacts and urgent action

Role	Name	Contact
DSL	Gemma Rowbotham	gemma@sendtuition.co.uk | 07854 878194
Deputy DSL	Elaine Roberts	elaine@sendtuition.co.uk | 07905 434809
Director / policy owner	Wendy Rowbotham	wendy@sendtuition.co.uk 07854086618

IMMEDIATE DANGER: Call 999 first. Do not wait for permission from the DSL. If a child is at risk of significant harm, contact the relevant local authority children's social care service / emergency duty team or police directly if the DSL cannot be reached or delay would place the child at risk. Inform the DSL as soon as safe. Follow the relevant local safeguarding partnership referral arrangements.

Concerns must be raised without delay, on the same day they arise. A promise to investigate within 24 hours must never delay an emergency referral. Where tuition is commissioned by a school or local authority, notify its DSL/commissioner promptly in line with information-sharing agreements, unless doing so would create further risk.

3. Recognising abuse, neglect and exploitation

Staff must remain professionally curious and recognise that abuse can happen at home, in education, in the community or online; risks may overlap. Indicators can include injuries, changes in behaviour, withdrawal, missing sessions, disclosures, concerning online contact or unexplained possessions. No single indicator proves abuse.

- Physical abuse, including inflicted injuries and fabricated or induced illness.
- Emotional abuse, including intimidation, humiliation, coercive control, domestic abuse exposure and discriminatory abuse.
- Sexual abuse, sexual harassment and harmful sexual behaviour, including image-based abuse, grooming and online exploitation.
- Neglect, including persistent unmet physical, emotional, supervision or medical needs.
- Child sexual exploitation and criminal exploitation, including county lines, trafficking and modern slavery.
- Child-on-child abuse, bullying, prejudice-based harassment, intimate relationship abuse and online abuse.
- Female genital mutilation, forced marriage and so-called honour-based abuse; radicalisation and extremism; serious violence and exploitation.

All concerns, including those involving conduct by another child, must be taken seriously and never dismissed as banter or an inevitable part of growing up. Staff must not investigate allegations themselves.

4. SEND, inclusion and the child's voice

Children with SEND may face additional barriers to recognising, describing or reporting harm, and adults must not assume injuries, distress or behaviour are solely explained by disability. Staff will use accessible language, visual supports, communication aids, interpreters or other reasonable adjustments as appropriate. Children should be listened to without leading questions, and their views recorded in their own words where possible.

Support plans and risk assessments should reflect communication needs, sensory differences, personal care, dependency on adults, online vulnerability and any known additional safeguarding risks. A child's disability must not reduce the threshold for taking action.

5. Responding to a disclosure or concern

- Listen calmly; take the child seriously, reassure them they have done the right thing and do not promise secrecy.
- Ask only open, necessary questions to clarify immediate safety; do not interview, investigate or confront an alleged perpetrator.
- Record promptly and factually: date, time, place, child's exact words where possible, observations, action taken, people informed and rationale.
- Report immediately to the DSL/deputy using the approved secure reporting channel. For emergencies, contact police/children's social care first.
- The DSL assesses risk, records decisions, seeks appropriate advice, makes referrals and follows up outcomes; staff must escalate if the response is inadequate.

Parents/carers are normally informed where appropriate, but not if this may place a child at greater risk or compromise an investigation. Consent is not always required to share necessary safeguarding information; decisions must be lawful, proportionate and recorded.

6. Referrals, family help and multi-agency working

The DSL will consider whether the child needs family help, a child in need assessment under section 17 of the Children Act 1989, or child protection enquiries under section 47. Referrals to local authority children's social care and police will

be made without delay where thresholds are met. Staff may make a direct referral where necessary. The DSL will seek acknowledgement and follow up if no response is received, recording all decisions.

Send Tuition will cooperate with safeguarding partners, schools and commissioners, share relevant information securely, and contribute to assessments and plans as appropriate. Where a child is missing from education or repeatedly absent, staff will follow the Attendance and Absence Management procedures and consider safeguarding risks.

7. Allegations and low-level concerns about adults

Concerns about any adult working for or on behalf of Send Tuition, including conduct outside work, must be reported immediately to the Director or designated case manager; concerns about that person should be referred to another unimplicated senior leader or directly to the local authority designated officer (LADO). The organisation will consult the LADO promptly where the harm threshold may be met, and consider police and children's social care involvement. Do not conduct an internal investigation before obtaining appropriate advice.

Low-level concerns inconsistent with the Code of Conduct but below the harm threshold must also be recorded, reviewed for patterns and escalated where needed. Suspension is not automatic; proportionate risk-management measures should be considered and documented. Statutory DBS referrals will be made where the legal conditions are met, including relevant removal or resignation circumstances.

8. Safer recruitment, vetting and induction

Send Tuition will apply role-appropriate safer recruitment checks: identity, employment history and gaps, suitable references, qualifications where relevant, right to work and criminal-record/barred-list checks only where legally eligible and appropriate to the role. An enhanced DBS certificate is not automatically transferable or sufficient to establish barred-list eligibility; checks must be assessed against the role and current DBS rules.

Send Tuition's existing operational standard is to review DBS arrangements at least every three years; this is an internal rule, not a universal statutory renewal period. Update Service status checks may be used only where the certificate and role are eligible and the individual has consented. Recruitment decisions, checks, training and induction will be securely recorded.

9. Online safety, communication and image-sharing

Staff must use Send Tuition-approved platforms and channels, maintain professional boundaries and never use personal social-media accounts or private messaging to contact learners. Online gaming/mentoring activities require appropriate supervision, risk assessment, platform safeguards and consent arrangements. Online safeguarding includes content, contact, conduct and commerce risks.

Do not photograph, copy, forward or delete suspected indecent images of children; do not ask a child to send or display them. Preserve essential contextual information and seek DSL/police guidance. Recording tuition sessions must have a defined safeguarding or educational purpose, lawful basis, clear notices, secure storage, restricted access and an approved retention period; it is not automatically required for every lesson.

10. Lone working, home tuition and off-site provision

Lone-working and home-visit risks will be assessed before provision starts and reviewed when circumstances change. Staff must follow check-in/check-out arrangements, maintain safe professional spaces, avoid bedrooms or isolated settings, have an emergency contact route and report hazards or concerns. Arrangements for adult presence, transport

and trips must reflect individual risks and agreed consent; staff should not provide student transport unless separately authorised and risk-assessed.

11. Training, supervision and staff conduct

All personnel receive safeguarding induction and role-appropriate refreshers covering reporting, online safety, SEND, child-on-child abuse, allegations, information sharing and professional boundaries. DSL/deputy training will be refreshed at least every two years as Send Tuition's operational standard, with updates between formal courses. Training completion, supervision and concerns about practice will be recorded.

The Code of Conduct prohibits inappropriate contact, gifts that compromise boundaries, discrimination, abusive conduct and unauthorised sharing of personal information. Staff should use whistleblowing routes when internal reporting is unsafe or ineffective; the NSPCC whistleblowing advice line is 0800 028 0285.

12. Safeguarding records and confidentiality

Safeguarding records must be accurate, dated, factual, securely held with restricted access, and kept separately from routine teaching records where appropriate. Records should show concern, actions, referrals, decisions, rationale, outcomes and follow-up. Information sharing must comply with UK GDPR and the Data Protection Act 2018; data protection rules must not be misused to prevent necessary safeguarding action. Retention and transfer follow the organisation's documented schedule and commissioning agreements.

13. Governance, review and related policies

The Director oversees implementation, resources, safer recruitment and annual policy review. The DSL manages safeguarding referrals, professional advice, records, training support and liaison with relevant agencies. All staff must report concerns and cooperate with safeguarding action. This policy should be read with the Behaviour, Online Safety, Attendance, Absence Reporting, Complaints, Health and Safety, Information Security, Data Breach, and Mobile and Remote Working policies.

This policy will be reviewed annually and earlier after a significant incident, change in law/guidance, audit finding or material change to provision.

14. Legislative and guidance framework

- Children Act 1989 and Children Act 2004; Children and Social Work Act 2017.
- Working Together to Safeguard Children 2026 (England).
- Keeping Children Safe in Education 2026, where directly applicable or adopted as good practice.
- Safeguarding Vulnerable Groups Act 2006 and applicable DBS referral/checking requirements.
- Equality Act 2010; Children and Families Act 2014.
- Data Protection Act 2018 and UK GDPR; relevant information-sharing guidance.
- Sexual Offences Act 2003; Female Genital Mutilation Act 2003; Domestic Abuse Act 2021; Modern Slavery Act 2015; relevant forced marriage legislation.
- Counter-Terrorism and Security Act 2015: Prevent duties apply where the organisation falls within the statutory scope; relevant safeguarding practice is adopted otherwise.

Government guidance: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2 and https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

15. Policy approval and version control

Policy owner	**Wendy Rowbotham, Director**
Approved by	Gemma Rowbotham
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Signature	Gemma Rowbotham

Version history

Version	Date	Summary
1.0	October 2025	Previous safeguarding and child protection policy.
2.0	October 2026	Updated guidance, reporting/escalation, safer recruitment, SEND, online safety, staff allegations and records; revised layout.