



Safeguarding and Child Protection Policy and Procedures

Revised May 2026

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The Trusted Tutors Safeguarding and Child Protection

Policy Statement

1. About the Trusted Tutor's Safeguarding and Child Protection Policy, 2026

The purpose of this policy statement is:

- to protect from harm, children and young people who receive services from Trusted Tutors. This includes the children of adults who use our services and children we may encounter through any area of our provision
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection and safeguarding.

This policy applies to anyone working on behalf of Trusted Tutors, including senior managers and the board of trustees, paid staff members/volunteers, sessional workers, agency staff and students.

This policy has been drawn up on the basis of legislation and statutory guidance that seeks to protect children in England and relevant parts of the United Kingdom where Trusted Tutors operate. It should be read alongside our Safer Recruitment Policy, 2025.

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.

We recognise that:

- the welfare of children is paramount in all the work that we do and in all the decisions we take
- working in partnership with children, young people, their parents, carers and other agencies, is essential in promoting young people's welfare
- 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
- extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

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

- valuing, listening to and respecting them
- appointing a designated safeguarding lead (DSL) for children and young people, a deputy DSL, and a nominated 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 and appointing a Designated Online Safety Lead by title
- providing effective management for staff and volunteers through supervision, support and training, 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 using safer recruitment procedures, ensuring that all necessary security checks are made
- recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- sharing information about safeguarding and good practice, as appropriate, with children and their families
- ensuring 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, volunteers, and any other adults, appropriately
- creating and maintaining an anti-bullying environment and dealing effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that a safe physical environment is provided for our children, young people, staff and volunteers, and by immediately taking protective steps and notifying the appropriate people of any concerns
- 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.

This is a core policy that forms part of the induction for all staff and tutors. It is a requirement that all members of staff and all tutors read and understand this policy, which is available on the Trusted Tutor's website and also in hard copy form in the Trusted Tutor's office. This policy must be read in tandem with at least Part 1 and Appendix A of the most recent issue of the statutory guidance document Keeping Children Safe in Education, currently September 2025 (KCSIE 2025), and the Trusted Tutors CEO team will require evidence that this has been done, before any work with children or young people can be undertaken.

Date reviewed and revised: May 2026.

Agreed and ratified by the Trusted Tutors CEO Team: May 2026.

Date of next review: May 2027, unless circumstances indicate that a review should be undertaken earlier.

This policy will be reviewed annually and/or as a result of updates to national and /or local guidance and/or procedures. There will be an additional review, as required, following any safeguarding incident.

2. Key Safeguarding Personnel at Trusted Tutors

Keeping Children Safe in Education suggests that it is not appropriate for the proprietor of an organisation to be the designated safeguarding lead (DSL). Trusted Tutors is a company with a team of CEOs, however the Designated Safeguarding Lead (DSL) and deputy DSL named below are only *part* of the CEO team.

The CEOs of Trusted Tutors will ensure that if invited by the Local Safeguarding Partners (the local authority, the Integrated Care Boards and the Chief Officer of Police), the company will contribute to multi-agency safeguarding in line with statutory guidance documents Keeping Children Safe in Education, September 2025 and Working Together to Safeguard Children, March 2026.

Designated Safeguarding Lead:

Natalie Ritter

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Telephone: 07821 550 721

Deputy Designated Safeguarding Lead:

Dorothy Milton

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3. Trusted Tutors' Ethos and the Purpose of this Policy

Trusted Tutors is a community of learners and all those directly connected to students (staff, tutors, parents, families, guardians and peers) have an essential role to play in making students feel safe and secure. Trusted Tutors recognises the importance of helping to foster an ethos that will help children and young people to feel safe and to be safe, within every teaching environment, including an online teaching environment.

This policy and procedures document sets out how Trusted Tutors will meet its statutory duty to safeguard and promote the welfare of children and help them to achieve good outcomes. Trusted Tutors will achieve this by ensuring staff and tutors have the skills and knowledge to recognise when children are at risk, and then act in order to get help when necessary.

Our core safeguarding principles are as follows:

- We are an important part of the wider safeguarding system for children. Children are those individuals from pre-birth up to the age of 18 years.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexuality, have equal rights to protection.
- It is the responsibility of all of us to safeguard and promote the welfare of children.

- The well-being and welfare of the child must come at the centre of our work. This child centred approach is fundamental to safeguarding every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.
- We recognise the importance of considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare. See Appendix 1 of this document – Some key definitions and indicators.
- All children have a right to be heard and to have their feelings considered.
- All our staff and tutors understand safe professional practice and adhere to our safeguarding policies.

4. Definition of Safeguarding

The slightly revised definition of the term 'safeguarding and promoting the welfare of children' that was first published in Working Together to Safeguard Children, December 2023, was reiterated and extended in Working Together to Safeguard Children, March 2026. It is reflected in the definition used in Keeping Children Safe in Education, September 2025.

Safeguarding and promoting the welfare of children is:

- **providing help and support to meet the needs of children as soon as problems emerge;**
- **protecting children from maltreatment, whether that is within or outside the home, including online;**
- **preventing impairment of children's mental and physical health or development;**
- **ensuring that children grow up in circumstances consistent with the provision of safe and effective care;**
- **promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children**
- **taking action to enable all children to have the best outcomes.**

It should be noted that the term 'children' includes everyone under the age of 18, and that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities (SEND), or children with any other additional vulnerability.

Children with SEND may have difficulties in understanding and recognising abuse themselves, and additional problems when trying to effectively communicate this to the relevant people. School staff and tutors should be extra vigilant when working with students with SEND and should avoid making assumptions that do not take indicators of abuse seriously. **Any concerns should be brought to the attention of the Trusted Tutors Designated Safeguarding Lead (DSL) or their deputy, as soon as possible, and if the tutor is working for Trusted Tutors, but in a school, college or other educational**

setting, it should be immediately brought to the attention of the DSL or Deputy DSL in that school, college or setting.

The Special Educational Needs and Disabilities Information and Support Services (SENDIASS), offers information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service which is likely to be well-known to the school SEND Department, but which may also be located at <http://councilfordisabledchildren.org.uk>.

Contextual Safeguarding recognises that as young people grow and develop, they are influenced by a complex range of environments and people outside of their family. They may encounter risks in school or college, in the local community, in their peer groups, online, in fact anywhere. Contextual safeguarding looks at how we can best understand these risks, engage with children and help to keep them safe. All staff and tutors, but especially the DSL and deputy DSL, should consider the context in which safeguarding incidents and behaviour occur and how they can be associated with factors outside the tutoring environment.

5. Key Responsibilities

- Trusted Tutors has a Designated Safeguarding Lead. This named person is also the designated Online Safety Lead (See page 5 above), taking the lead role in ensuring that the company has effective safeguarding and online safety policies, which interlink with other related policies; and that consider the four C's of online risk (Content, Contact, Conduct and Commerce) are at the forefront of all relevant Trusted Tutors' activities; that agreed procedures are in place and being followed; and that the policies are reviewed at least annually and whenever required
- The Trusted Tutors DSL is also the designated Online Safety Lead (See page 5 above), taking the lead role in ensuring that the company has effective online safety policies, which interlink with other related policies and which place the four C's of online risk (Content, Contact, Conduct and Commerce) at the forefront of all relevant Trusted Tutors' activities; that agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required
- The CEOs of Trusted Tutors will ensure that the DSL/Online Safety Lead is properly supported in their role. Because Trusted Tutors is neither a school nor a college but an independent training provider, there is no requirement for the organisation to have a governing body. Instead, the CEOs of the company take on board the safeguarding duties more often held by a governing body or proprietor, including the responsibility for *all* governors/proprietors to undertake regularly-updated safeguarding and child protection training in order to be more able to effectively comply with their safeguarding duties under legislation
- In addition, the CEOs of Trusted Tutors are aware of the Human Rights Act 1998 (The HRA) in that it compels public organisations to respect and protect an individual's human rights when they make individual decisions about them
- Also, the CEOs of Trusted Tutors are aware of the Data Protection Act 2018, and of the UK General Data Protection Regulations (GDPR), which places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Sharing information on Prevent should be treated the same as

wider safeguarding. Trusted Tutors follows their existing processes for sharing information about learners susceptible to radicalisation and are aware of the Prevent referral process in the local authority in which the Trusted Tutors registered office is situated.

- The CEOs of Trusted Tutors are also aware that safeguarding legislation, statutory guidance and perceived good practice may change at any time, usually as a result of significant cases coming to light, and that when this occurs CEOs must be aware and information must be provided to staff members as a matter of urgency. For example, the government guidance document 'Use of Reasonable Force', 2013, has been revised and was reissued on April 1st 2026 as 'Restrictive interventions, including the use of reasonable force.' Other government guidance documents are likely to be updated in 2026, and may introduce new legal duties for those taking part in a regulated activity. As soon as the content of new statutory and non-statutory safeguarding documents is known, details will be circulated to all members of staff and will become part of the Trusted Tutors safeguarding training.

The Trusted Tutors Safeguarding Committee is made up of the DSL and a deputy designated safeguarding lead, who has undertaken the same training as the DSL.

5.1 Our Designated Safeguarding Leads (DSLs)

- The role of the designated safeguarding lead and deputy DSL is to take lead responsibility for safeguarding and child protection within the company, to be available during office hours for staff and tutors to discuss safeguarding concerns, and to follow the guidance given in the statutory guidance document Keeping Children Safe in Education and ensure that there is a way of contacting the DSL or the deputy DSL at all times. Their contact details are on page 5 of this document. Either the DSL or the Deputy DSL will be able to be contacted by telephone at all times.
- Because some of the work of Trusted Tutors may be with children and young people who are not on roll at any school, college or other education provider, the Trusted Tutors DSL is the *sole* DSL for those individuals and takes on all of the related safeguarding responsibilities. However much of the work of Trusted Tutors is with children and young people who *are* on roll at a school, college or other education provider, whether or not the tuition takes place on the school site, and in those cases the Trusted Tutors DSL works together with the DSL from that setting because, as is confirmed within KCSIE 2025, schools continue to be responsible for the safeguarding of pupils they place with an alternative provision provider.
- The DSL will undergo regular, appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and deputy DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals, and at least annually.
- The Trusted Tutors Deputy DSL is trained to the same standard as the DSL. Whilst the activities of the DSL may be delegated to the deputy, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated

It is the role of the DSL to:

- Read and understand the most recent issue of Keeping Children Safe in Education, and in particular, the role of the designated safeguarding lead.
- Act as the central **contact point** for all Trusted Tutors staff and tutors to discuss any safeguarding concerns and to work together with the DSL team of any school, college or other education provider, as necessary.
- Maintain a **confidential recording system** for safeguarding and child protection concerns.
- Where a young person is not on the roll of any other education provider, securely transfer any child protection file made, to a young person's new school, as soon as possible and within five days of the start of a new term. The file should be transferred separately from any other pupil file held by Trusted Tutors, and a receipt must be obtained.
- Coordinate safeguarding action for individual children.
- Ensure that locally established referral procedures are followed as necessary.
- Liaise with and **manage referrals** to relevant agencies such as the relevant Multi-Agency Safeguarding Hub (MASH), the relevant Local Authority Designated Officer (LADO), the Police, and the Disclosure and Barring Service (DBS).
- Ensure the company's safeguarding and child protection policies are **up to date** and **consistent** with local policies.
- Ensure that **safer recruitment** practice is followed when recruiting new members of staff and tutors.
- Ensure that **procedures are in place** to deal with allegations made against tutors or members of staff, and that in the case of allegations not meeting the harm threshold, or later discovered to be unfounded, false, malicious or un-substantiated, that there are procedures in place for learning from the situation and improving the Trusted Tutors' safeguarding policy and procedures.
- Ensure all staff and tutors have access to **safeguarding training and updates** in line with the recommendations within Keeping Children Safe in Education (2025).
- Ensure regular reporting on safeguarding activity and systems in the company to the CEO team. However, the CEO team will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

5.2 Trusted Tutors Safeguarding Committee

The members of the safeguarding committee have a responsibility to:

- Be aware of the key points of Child Protection procedures, outlined in Keeping Children Safe in Education (2025).
- Be prepared to identify children who may benefit from **early help or family help** (See Section 13 of this policy and procedures document).
- Understand the early help process and their role in it.
- Understand the Trusted Tutors' **safeguarding policies and systems**.
- Undertake appropriate training which is regularly updated.
- Be aware of the process of **making referrals** to children's social care and statutory assessment under the Children Act 1989. If in need of guidance, staff and tutors should refer to the guidance document, 'What to do if you're Worried a Child is Being Abused' (2015).
- Know what to do **if a child tells them** that he or she is being abused or neglected.
- Know how to maintain an appropriate level of **confidentiality**.

- Be aware of the **indicators of abuse and neglect** so that they are able to identify cases of children who may be in need of help or protection.
- Refer to the London Safeguarding Children Partnership (earlier known as the London Safeguarding Children Board) thresholds and eligibility criteria to help make decisions on the child's level of need and the appropriate service to refer to for services. Also to refer to similar documents produced by the London Borough of Hackney, where Trusted Tutors is based, and/or to similar documents produced by the local authority where a specific student may be living, or may be educated within a school, college or other educational setting. Committee members will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral to the appropriate local authority
- Review all safeguarding policies on at least an annual basis, or more often where there has been a safeguarding incident, and maintain an oversight of all child protection procedures in the Trusted Tutors business.
- Remain updated on safeguarding and child protection matters in the news (via e-bulletins) and membership of national organisations such as the National Society for the Prevention of Cruelty to Children (the NSPCC).

5.3 Our Other Trusted Tutors Members of Staff

Outside of the Safeguarding Committee, Trusted Tutors staff have the responsibility to:

- Be aware of the key points of Child Protection procedures, outlined in Part 1 and Annex A of Keeping Children Safe in Education (2025).
- Be prepared to identify children who may benefit from **early help, family help, or a referral to their local authority children's social care team for support or intervention.**
- Understand Trusted Tutors' **safeguarding policies and systems.**
- Undertake **regular and appropriate training** which is regularly updated.
- Confront and know what to do without delay **if a child tells** them that he or she is being abused or neglected.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the **indicators of abuse and neglect** so that they are able to identify cases of children who may be in need of help or protection.
- Trusted Tutors will ensure that a student has at least one emergency contact saved to their file, preferably more. Parents will be asked to update the company on any changes to their contact details, including the number of their mobile phone. This is so that parents can be contacted quickly in case of an accident or other emergency, or if a student has poor attendance (either at school or in their home- schooling programme) parents/carers can be alerted without delay. Tutors working in schools are to report daily on attendance to the designated staff member at Trusted Tutors who will then report to the relevant school. This way attendance can be monitored and any absences can be followed up with the school, parent or guardian. Trusted Tutors will operate a 'First Day Calling System' regarding any student who fails to arrive for tuition without pre-warning by a parent, or who is absent from the teaching venue when the tutor arrives for a teaching session. Tutors are expected to contact the Trusted Tutors office within fifteen minutes of a "no show".
- More information on **Children Missing Education (CME), Children Absent from Education, and other specific and named safeguarding issues** can be found in Appendix 1 of this policy

document.

5.4 Our Tutors

All tutors have a responsibility to:

- Be aware of the key points of Child Protection procedures, outlined in Part One and Annex A of Keeping Children Safe in Education (2025)
- Understand Trusted Tutors' **safeguarding policies and practices**
- Undertake **appropriate training** which is regularly updated
- Be prepared to raise concerns over a child's welfare with the Trusted Tutors DSL or deputy DSL, and if appropriate, with the DSL or deputy DSL of a school, college or other educational setting
- Know what to do **if a child tells them** that he or she is being abused or neglected
- Know how to maintain an appropriate level of **confidentiality**
- Be aware of the **indicators of abuse and neglect** so that they are able to identify cases of children who may be in need of help or protection

The Trusted Tutors Safeguarding and Child Protection Procedures

6. Context

Trusted Tutors operates across a number of local authorities, largely within central and outer London, so this policy has been developed to reflect policy advice given by the London Safeguarding Children Partnership, updated and published in September 2025, in accordance with the principles established by the Children Acts 1989 and 2004 and related government guidance documents. This includes:

- Keeping Children Safe in Education (2025, Department for Education)
- Working Together to Safeguard Children (2026, Department for Education)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (Last updated, 1st May 2024)
- Trusted Tutors acknowledges that its safeguarding and child protection procedures relate to the vigilant prevention and management of a range of specific safeguarding issues - Abuse, neglect and exploitation of all types, including, but not limited to the following:
 - Child-on-child Abuse
 - Child Criminal Exploitation (CCE)
 - Child Sexual Exploitation (CSE)
 - Domestic Abuse and Domestic Violence/DV
 - Female Genital Mutilation (FGM) and other sexually related issues such as breast ironing
 - Mental Health
 - Serious Violence
 - Children with family members in prison
 - Children Missing Education (CME)
 - Children Absent from Education
 - Children missing from home or care
 - County Lines
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith-based abuse
 - Filtering and monitoring
 - Forced marriage
 - Gangs and youth violence
 - Gender based abuse and violence against women and girls
 - Homelessness
 - Honour based abuse
 - Human trafficking and modern slavery
 - Online safety
 - Prevent, and preventing radicalisation and extremism
 - Private fostering
 - Relationship abuse
 - Sexual Violence and Sexual Harassment
 - Youth produced sexual imagery or 'Sexting'
 - "Upskirting" and "downblousing"

- Online abuse, including the four C's of online risk (Content, Contact, Conduct and Commerce)

See Appendix 1 of this Trusted Tutors document for some key definitions and indicators, extracted and/or adapted from definitions contained within Keeping Children Safe in Education. This is important additional information on abuse, neglect and other safeguarding issues including signs and symptoms and what to look out for.

7. Related Safeguarding Policies

This policy is one of a series of safeguarding policies in the Trusted Tutors integrated safeguarding portfolio, and as a minimum it should be read in conjunction with the documents listed below:

- Keeping Children Safe in Education (2025), Part 1, Part 3 and Annex A
- The Trusted Tutors 'Staff and Tutor Code of Conduct'
- The Trusted Tutors 'Safer Recruitment Policy'
- The Trusted Tutors 'Reporting Procedures'
- The Trusted Tutors 'Data Protection Policy'
- The Trusted Tutors 'Online Safety Policy'

8. Recognition and Types of Abuse and Neglect

- All staff and tutors should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
 - o Physical abuse
 - o Sexual abuse
 - o Emotional abuse
 - o Neglect
- Staff and tutors have a responsibility to identify those children and young people who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a student are reported to the Trusted Tutors DSL or Deputy DSL, and in addition, where a Trusted Tutors student is also attending a school or college, to the DSL or deputy DSL of their education setting, without delay.
- Staff and tutors should refer to **Appendix 1** of this policy for a full definition of significant harm, including abuse, neglect and exploitation, and the specific indicators that may suggest a pupil may be at risk of suffering significant harm.
- Members of staff and tutors should be aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Furthermore, issues are rarely stand-alone events that can be covered by one definition or label. In many cases, multiple issues will overlap with one another.
- The warning signs and symptoms of child abuse, neglect and exploitation can vary from child to child. Children and young people also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Special care should be taken not to confuse the indicators of abuse and other safeguarding issues with the indicators of certain types of special educational need, disability, sensory needs or physical health or medical condition.

- Children and young people with a range of inclusion needs, including learning difficulties, physical differences and gender or sexual orientation issues, may be more vulnerable to bullying, blackmail, grooming or other antisocial approach, and may find it difficult to tell anyone about these things. Tutors should be more aware in these cases.
- Children and young people who are limited in their ability or unable to tell the difference between fantasy and fact, may find it difficult to understand some types of online content or approach, and may copy antisocial behaviours seen on television or elsewhere, without any idea of what the consequences might be.
- Parental behaviours may also indicate child abuse or neglect, so staff and tutors should also be alert to parent-child interactions or concerning parental behaviours.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that an apparently warning sign doesn't automatically mean a child is being abused, but it does mean that at the very least the DSL(s) must be informed and the situation must be monitored.

9. Disclosures

If a pupil discloses the fact that they are being abused to a Trusted Tutors member of staff or tutor, the member of staff or tutor:

- should listen to what is said without displaying shock or disbelief and accept what the child is saying;
- should allow the child to talk freely;
- should reassure the child or young person, but not make any promise that may not be possible to keep, or promise confidentiality. This is because a referral may have to be made to the child's local authority (See section 12 of this document);
- should reassure the child that what has happened is not their fault and that they were right to tell them;
- should not ask direct questions but allow the child to tell their story;
- should not criticise the alleged perpetrator;
- should explain what will happen next and who has to be told;
- should make a formal record and pass this on to the appropriate DSL(s) or Deputy DSL(s), without delay.

10. Reporting Procedures, Record Keeping and Making Referrals

10.1 Reporting

- Staff and tutors 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 and tutors should always act in the best interests of the child.
- If staff or tutors have any concerns about a child's welfare, they should act on them immediately. See Section 11 for a flow chart setting out the process for staff when they have concerns about a child.

- In the **absence of the DSL** when an immediate and urgent concern needs to be discussed, staff and tutors should seek advice from the Deputy DSL. They may also seek advice from the NSPCC or other advisory services (see section 20). If anyone other than the Trusted Tutors DSL makes a referral to external services, then they will inform the DSL as soon as possible.
- If staff or tutors have a concern about a child **outside of office or school/college hours**, they should use the telephone numbers of the Trusted Tutors DSL or deputy DSL and can contact social services directly, or the police if a crime may have been committed and/or the child is at immediate risk. If a Trusted Tutors member of staff or tutor senses that a child is in immediate danger or at risk of harm, and there is no DSL immediately available, that member of staff or tutor should call the police by dialling 999 but should tell the DSL about the whole situation as soon as possible, following this by giving them a written report.
- On page 17 of this document there is a diagram headed '**What to do if you have a welfare concern at Trusted Tutors**'. This is the procedure to follow if the student concerned *is not currently on the roll of a school, college or other education setting*. If the student *is* currently on roll at a school, college or other educational setting, then the same Trusted Tutors procedure should be followed, **but in addition the safeguarding procedures of the school, college or other educational setting must be followed and their DSL or deputy DSL must be contacted *without delay*, or in the case of an allegation to be made against a staff member of the school, college or setting, the Head Teacher must be contacted *without delay*.**

NB – As mentioned above, please see Appendix 1 of this policy and procedures document for some key definitions and indicators, extracted and/or adapted from definitions contained within Keeping Children Safe in Education, 2025. This is important additional information on abuse, neglect, exploitation and other safeguarding issues, including signs and symptoms and what to look out for.

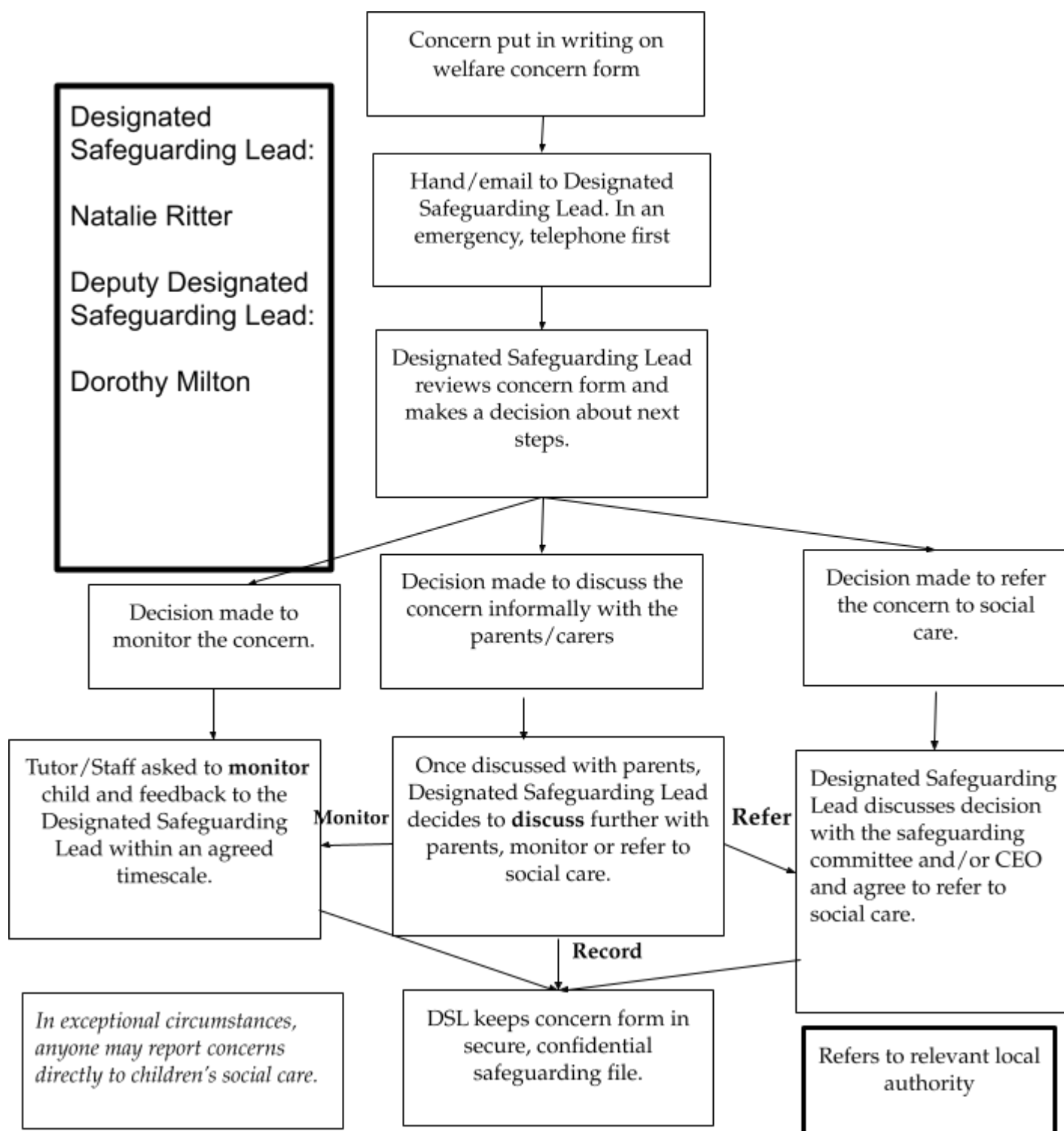
10.2 Record Keeping

- All safeguarding concerns, discussions and decisions (and reasons for those decisions) will be recorded in writing. If members of the Trusted Tutors staff body are in any doubt about recording requirements, they should discuss their concerns with the Trusted Tutors DSL.
- Trusted Tutors staff and tutors will record any welfare concern that they have about a child on the Trusted Tutors incident and concern form (with a body map if injuries have been observed) and pass them without delay to the Trusted Tutors DSL, preferably by email or telephone (but, if this is not possible for whatever reason, by bringing it into the office in person). Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff or tutor. If there is an immediate concern the member of staff or tutor should consult with an appropriate DSL as a priority.
- Any verbal conversation (either with other members of staff/tutors or with the child concerned) should be promptly recorded in writing using the incident and concern form. Any rough notes should be retained and stapled to a later and more legible copy, as in court the earliest written record generally takes precedence as a piece of evidence.
- Incident and concern forms should be emailed to the DSL. If this is not possible, they should be brought into Trusted Tutors office in person and handed to the DSL.

- Welfare concern forms can be accessed via Google Drive. They can also be found in the Trusted Tutors office.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff and tutors on a 'need to know' basis only.
- The Trusted Tutors CEO team will be kept informed of any significant issues by the DSL.
 - On occasion, staff members or tutors may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff and tutors should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered;
 - If, following this process, the staff member or tutor remains concerned, it is the responsibility of that staff member or tutor to follow the company's escalation process (see Section 20).

11. The Trusted Tutors Referral Processes

- When a Trusted Tutors tutor is working with a child or young person who is not otherwise on roll at a school, college or other education setting, the Trusted Tutors tutor should follow the Trusted Tutors Safeguarding and Child Protection policy and procedures, summarised by the diagram on the next page.
- At all other times, when a tutor is working on behalf of Trusted Tutors in a school, college or other education setting, the referral process for a student who *is* on roll at that school, college or education setting is the same, but in addition the safeguarding and child protection policies and procedures of that setting must be followed and the DSL or deputy DSL must also be notified, without delay.



Contacts:

[Report Child Abuse to Your Local Council](#)

[London Safeguarding Children Partners](#)

12. Referrals

- Trusted Tutors recognises that its role in situations where there are child protection concerns is not to investigate, but to recognise and refer.
- Trusted Tutors adheres to the London Safeguarding Children Partnership Child protection procedures. The full London procedures and additional guidance relating to specific safeguarding issues can be found on the website: www.londoncp.co.uk.
- After an incident or concern is reported to the Trusted Tutors DSL, they will work in tandem with the DSL of any school, college or other education setting and the next steps will include one or more of the following actions:
 - The Trusted Tutors safeguarding committee and relevant staff/tutors will manage support for the child internally;
 - The Trusted Tutors safeguarding committee will conduct an early help assessment (see section 13) and/or;
 - The Trusted Tutors DSL or the DSL from the education setting will make a referral to statutory services (in cases where the child is in need, is suffering, or is likely to suffer harm).

Referrals must be made to the child's local authority (LA). That is, the LA where the child *lives*. The LA will differ from family to family, as Trusted Tutors works with families from multiple locations. The online tool [Report Child Abuse to Your Local Council](#) will direct the DSL to the relevant local children's social care contact number. Contacts for London Local authorities can also be found on the London Safeguarding Children Partnership website, [here](#).

- If verbal referral is made to local children's services, then this should be followed up by a written referral as soon as possible and within 48 hours;
- **In all but the most exceptional circumstances, parents/carers of the student will be made aware of the concerns for their child at the earliest possible stage.** In the event of making a referral, parents/carers will be informed and consent to this will be sought in line with guidance provided by [Keeping Children Safe in Education \(2025\)](#), unless there is a valid reason not to do so (for example, if to do so would put a child at risk of harm or would undermine a criminal investigation). A referral will be made regardless of consent being given in cases where there are safeguarding concerns about the child and making a referral is a proportionate response to those concerns. See Section 15 of this Trusted Tutors policy and procedures document for further guidance on consent.

All members of staff are made aware of the local early help support services (see Section 14 of this policy and procedures document). Where a child is being offered or is receiving 'early help' support, staff will be supported to understand their role in any early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

The DSL will keep all early help cases under constant review and will liaise with the DSL of the child's school or college. Consideration will be given to a request for more support if the situation does not appear to be improving or is getting worse.

13. Filtering and Monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, Trusted Tutors should be doing all that they reasonably can to limit children's exposure to the above risks from a school's or college's IT system. As part of this process, before starting to work with a school or college, Trusted Tutors' DSL will ensure their school or college has appropriate filtering and monitoring systems in place and that they regularly review their effectiveness in coordination with the school's or college's DSL. The DSL should ensure that relevant staff and tutors have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. If a tutor, while working with student/s online at their school notice that a student is able to download or obtain a concerning or inappropriate image or download, the school's DSL or DDSL should be notified immediately. Trusted Tutors' DSL should then be informed.

14. Early Help

- Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising.
- Trusted Tutors staff and tutors will endeavour to identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating.
- Effective early help relies upon tutors, staff and local partnerships including schools, colleges and other educational settings, working together to:
 - Identify children and families who would benefit from early help;
 - Undertake an assessment of the need for early help, using the London Threshold Document.
 - Provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve the outcomes for the child.

Staff and tutors should, in particular, be alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing or absent/goes missing is absent from care or from home;
- Is at risk of modern slavery, trafficking or exploitation;
- Is at risk of being radicalised or exploited;
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- Is misusing drugs or alcohol themselves;
- Has returned home to their family from care;
- Is a privately fostered child.

If the child requires an early help service and is not on roll at any school, college or other education setting, Trusted Tutors will make a referral to the Early Help service of the child's local authority. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.

- Trusted Tutors recognises that all matters relating to child protection are confidential. The DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis;
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children;
- Fears about sharing information must not be allowed to stand in the way of the need to protect a child. This includes allowing practitioners to share information without consent, if for the purposes of keeping children safe;
- All staff and tutors must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing;
- Staff and tutors should refer to the 'seven golden rules to sharing information' of the DfE Guidance on Information Sharing (July 2018) for guidance;
- Whilst all staff and tutors should, wherever possible, seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared, there may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk;
- Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

15. Family Help

Family Help is a voluntary, community-based support system designed to help parents and children (ages 0-19) overcome challenges before they escalate to severe crises. It connects families with tailored social work, health, and educational resources and works at an early stage to provide comprehensive support that will minimise the possibility of statutory social care. Family Help practitioners offer both practical and emotional support for a wide range of life issues, including conflict, parenting skills, housing issues and supporting children at risk of school exclusion.

16. Multi-agency Working

- Trusted Tutors recognises and is committed to its responsibility to work with other professionals and agencies such as social care, health, the police and in the case of 'looked-after children', the Virtual School. This is in line with statutory guidance outlined in Working Together to Safeguard Children (2023), which is why a safeguarding concern will be shared with the DSL of a school, college or other educational setting, where appropriate and unless there is a good reason not to do so;

- Education providers are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. Trusted Tutors recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings;
- The Trusted Tutors DSL and Safeguarding Committee will work to establish strong and co-operative relationships with relevant professionals in other agencies.

17. Confidentiality and Information Sharing

- Trusted Tutors recognises that all matters relating to child protection are confidential. The DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis;
- All members of staff must be aware that whilst they have duties to keep any information confidential, they may also have a professional responsibility to share information with other agencies, in order to safeguard children;
- Fears about sharing information must not be allowed to stand in the way of the need to protect a child. This includes allowing practitioners to share information without consent, if for the purposes of keeping children safe;
- All staff and tutors must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing;
- Staff and tutors should refer to the 'seven golden rules to sharing information' of the DfE Guidance on Information Sharing (May 2024) for guidance;
- Whilst all staff and tutors should, wherever possible, seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared, there may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk;
- Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

18. Safer Recruitment Procedures

Trusted Tutors is committed to ensure that all steps are taken to ensure that the tutors that are placed with students and the staff members that are recruited are all safe to work with children. We are committed to:

- safeguarding and protecting all children by implementing robust safer recruitment practices
- identifying and rejecting applicants who are unsuitable to work with children;

- responding to concerns about the suitability of applicants during the recruitment process;
- responding to concerns about the suitability of tutors and staff members once they have begun their role;
- ensuring all new staff and tutors have access to an induction which includes training in core safeguarding procedures.

The Safeguarding Committee is responsible for ensuring that Trusted Tutors follows safer recruitment processes:

- We require that all staff and tutors disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- Members of staff or tutors working with children under-8 years old must inform Trusted Tutors that they are not disqualified from working according to the Disqualification under the Childcare Act (2006). If there are any changes to their status, they must inform Trusted Tutors. See the statutory guidance for disqualification criteria.
- If someone who has applied to tutor through Trusted Tutors is barred from working with children, Trusted Tutors will notify the police.
- If an applicant has not been barred from working with children but the checks have raised concerns (for example if they have a criminal record), Trusted Tutors recruitment team will carry out a risk assessment to ascertain whether the applicant is suitable to work with children.
- Trusted Tutors recruitment team will only share information about an applicant's criminal record with those who need to know. The applicant will be told who it is within the organisation, that knows about their record.

Please refer to Trusted Tutors' Safer Recruitment Policy for full outline of Trusted Tutors' Safer Recruitment processes and procedures.

18.1 Disclosure and Barring Service (DBS) checks

- All applicants for posts with Trusted Tutors will be asked to undertake an enhanced DBS checks at the appropriate level if they will be engaging in 'regulated activity' in the course of their work (See KCSIE 2025). In cases where an applicant has lived or worked abroad for any period of time, Trusted Tutors are very likely to ask them to provide the equivalent of a DBS check in those countries. In cases where checks have been carried out prior to joining Trusted Tutors, the DBS Update Service will be used and the applicant will be asked to show their original certificate to a member of the recruitment team. Where an applicant has not yet signed up to the DBS Update Service a new DBS check will be undertaken.
- Tutors and staff must provide Trusted Tutors with the necessary documentation to process a DBS and they must comply with all the relevant steps of the process in a timely manner. By signing up to tutor through Trusted Tutors, tutors agree to cover the cost of their DBS check.
- Repeat DBS checks must be carried out every two years (unless a subscription has been made to the government update service, in which case an online check will be performed by the recruitment team every two years).

- Tutors who only tutor online are still required to provide Trusted Tutors with a DBS certificate.
- In the event of a tutor being recruited through an agency or other third party, they provide Trusted Tutors with a record of exactly which checks have been undertaken on their tutor, which is kept on file at Trusted Tutors after the information is transferred to our Single Central Register. Trusted Tutors then provides a letter of assurance to a school or college, detailing all checks undertaken by Trusted Tutors and the third party.
- Trusted Tutors will obtain written confirmation that the third party has carried out the same checks that Trusted Tutors themselves would have carried out, and will obtain a copy of the DBS certificate from the third party.
- The type of DBS certificate that a tutor has, must be made explicit to the client. In working with schools an Enhanced DBS check must be carried out.
- Trusted Tutors must see the original DBS certificate in order to confirm that an applicant has undergone the appropriate checks.
- Failure to renew or obtain a DBS will prevent a tutor from starting or continuing tuition placements.
- Trusted Tutors has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff or tutor has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left first. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff or tutor, a referral will be made as soon as possible after the resignation or removal of the individual, in accordance with advice from the local authority Designated Officer, commonly known as the LADO.
- The Trusted Tutors DSL will consult the LADO and the police, also government guidance documents on DBS referrals, when making the decision of whether or not to refer. If advised by LADO, Trusted Tutors will refer to DBS and/or teaching services to indicate potential prohibition.

19. Staff Induction, Awareness and Training

- All members of staff and tutors will be provided with this policy and a copy of Part One and Annex A of Keeping Children Safe in Education (2025), which covers Safeguarding information for all staff and tutors, as part of their induction. All staff must read and understand these two documents. The Safeguarding Committee and CEO team will read the entirety of the government statutory advice document, Keeping Children Safe in Education, 2025.
- Staff and tutors should always prioritise the welfare of children. They should report all concerns about abusive behaviour (including behaviour being displayed by an adult or child and directed at anybody of any age) to the DSL.
- Staff and tutors must treat children fairly and without prejudice or discrimination.
- They should promote relationships that are based on openness, honesty, trust and respect.
- Staff and tutors should exercise caution when discussing sensitive issues with children, not least because discussion of such subjects may be misconstrued as being 'grooming'.
- Staff and tutors must be aware of the DFE guidance related to terminology and "children who are lesbian, gay, bisexual, or questioning their gender." This is published within Keeping Children Safe in Education, however updated stand-alone government guidance on working with gender-questioning children is also due to be published during 2026.

- If a member of staff or tutor is alone with a child, where possible they should ensure that they are within sight or hearing of another adult, by leaving the door open or by sitting directly in front of the glass window in the room door.
- Tuition may be conducted in the student's home after a risk assessment has been carried out, but preferably tuition will take place in a public space that is appropriate for learning (e.g. a public library). If neither of these are possible, alternative arrangements should be discussed with the Trusted Tutors Client Manager.
- When working with children, tutors and other staff must not smoke, vape, consume alcohol or illegal substances, or take even prescribed medicines within view of the student. They should not take unnecessary personal risks or put the child's safety at risk in any way.
- All staff members and tutors will have access to online safeguarding training to ensure they are aware of a range of safeguarding issues. The safeguarding committee will maintain an up-to-date register of who has been trained. Refresher safeguarding training, either on-line or face-to-face, will be completed at least on an annual basis, but additionally whenever Trusted Tutors decides that a refresher would be appropriate. Where schools, colleges or any other educational setting with whom a tutor is working, offers the tutor access to the setting's regular safeguarding training, the tutor is welcome to take up the offer but will still be expected to take up the Trusted Tutors safeguarding training whenever it is provided, and at least annually.
- All staff members and tutors will be made aware of Trusted Tutors expectations regarding safe and professional practice via this policy (see section 18 of this document).
- All staff members and tutors will be made aware of Trusted Tutors expectations towards their responsibility towards filtering and monitoring requirements of schools and any other tuition partners where tuition is being given using the school or centre's IT equipment.
- The Trusted Tutors DSL will provide regular reports, at least annually, to the CEO team, detailing safeguarding training undertaken by all staff and tutors.
- Any member of staff or tutor affected by issues arising from concerns for children's welfare or safety, may seek support from the DSL.
- Trusted Tutors will provide appropriate training and support as detailed above, to ensure that all staff and tutors are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.

20. Code of Conduct for Staff and Tutors

- Tutors and staff should be aware that even well-intentioned physical contact may be misconstrued by the pupil or an observer. There may be occasions when it is appropriate to have physical contact with a child, however it is crucial that any physical contact is in response to the child's needs at the time and is appropriate to their age, stage of development, gender, ethnicity and background. Staff and tutors should use their professional judgement at all times. Extra caution may be required where it is known that a child has suffered previous abuse or neglect or is particularly vulnerable.
- **All** email communication from tutors to students, parents and/or schools must carbon copy (cc) the Trusted Tutors member of staff, organising or overseeing the placement.
- Communications from tutors to students, parents and/or schools must be strictly professional and not contain evaluations or comments about the tuition, the student or the

placement etc. All such communication should be written on the Half Term or End of Term report proforma, as appropriate, or as directed by Trusted Tutors.

- Tutors and staff should not use any form of degrading or humiliating language or treatment (e.g. sarcasm, demeaning or insensitive comments), to punish a child, or for any other reason.
- Tutors and staff should not use physical intervention as a form of punishment, but only as a form of protection if absolutely necessary (See below).
- Tutors and staff will not be accused of inflicting corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child. Existing government guidance on this is 'Use of Reasonable Force', 2013. This is currently under review and a revised version should be published in 2026.
- Tutors and staff should always seek to defuse situations and avoid the use of physical intervention wherever possible. Where physical intervention is necessary, they should only use minimum force and for the shortest time needed, and as soon as possible should report their action to the DSL at Trusted Tutors.
- Tutors and staff must not develop inappropriate relationships with children. They should make every effort to ensure that their own behaviour cannot be brought into question and that they maintain professional boundaries, and that nothing they say or do might be misunderstood or considered to be unprofessional.
- Tutors and staff must not give students their personal contact details (mobile number, email or postal address) and they must not have contact with them via a personal social media account. Tutors and other staff are asked to keep a careful eye on their own possessions, diary, handbag, wallet etc, whilst working with students. Any instances of students acquiring personal information and/or using a tutor's personal contact details without the tutor's permission should be reported immediately to the Trusted Tutors DSL or deputy DSL, as should any inappropriate student-initiated communications, presents, cards etc.
- Permission to accept a present of any sort from a student or their parents/carers, including money, must be sought from the trusted Tutors DSL.
- Permission to engage in any additional paid or voluntary employment on behalf of a student or their parents, must be sought from the Trusted Tutors DSL. This would include additional tuition, babysitting, acting as a chaperone to any type of event etc.
- Staff and tutors must not offer lifts in their car to Trusted Tutors students.
- Tutors and staff must only take photos of a student if the student and parents/guardians are happy for them to do so and have given permission in writing. They must only publish images of pupils where they and their parent have given explicit written consent to do so
- Tutors and staff must not promise to keep secrets for children.
- Tutors and staff must not engage in behaviour that is in any way abusive, including having any form of sexual or violent contact with the child, or grooming a child to expect that some form of inappropriate relationship will develop at a later date. Grooming a child is an illegal act.
- If a tutor or member of staff behaves inappropriately, Trusted Tutors will review their suitability to work with children and young people, and depending on the seriousness of the situation, may also make a report to statutory agencies such as the police and/or the local authority child protection services and/or the Disclosure and Barring Service.

- During their Trusted Tutors induction, tutors and staff are made aware of our systems which support safeguarding. These include our child protection policy, including our procedures for dealing with child-on-child abuse; our behaviour policy, including our measures to prevent all types of bullying; our staff behaviour policy/code of conduct, which includes details of what to do in cases described as 'low-level concerns' or 'allegations', and whistleblowing.

20.1 Physical contact and care

- In all cases where physical contact has taken place, tutors and staff are asked to record the incident and report it without delay to the Trusted Tutors DSL and the student's parents/carers, using the incident and concern form (see section 10.2).
- Where it can be anticipated that physical contact is likely to be required, Trusted Tutors will help the tutor or member of staff to put in place a plan which the student and parents/carers are aware of and have agreed to, if at all possible *before* any incident is likely to occur.
- Tutors and staff should only provide personal care in an emergency, and if possible, they should make sure there is more than one adult present. An exception to this is if it has been agreed that the provision of personal care is part of their role and they have been trained to do this safely.
- Tutors and staff should not administer medication to a child, unless this has been agreed by the family in writing and they have been trained to do this safely.

21. Online Tutoring (at home and in school)

For all online tutoring completed by Trusted Tutors, Trusted Tutors will provide:

- Clear staff training in how to monitor child protection and safeguarding in online tutoring sessions including applicable roles and responsibilities in relation to filtering and monitoring.
- Clear tutor training on how to conduct themselves in a safe and appropriate manner throughout tutoring sessions.
- The safe and limited access storage of all data and recording generated as a result of online sessions. GDPR applies as per Trusted Tutors' Data Protection policy.
- A Designated Safeguarding Lead (DSL) who is responsible for supporting and training all staff and volunteers in Trusted Tutor's work, ensuring that all Trusted Tutors staff and volunteers are sufficiently vetted, acts as the main point of contact in the event of any allegation or disclosure, acts as the main point of contact between Trusted Tutors and partner schools.
- Trusted Tutors is directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

21.1 Online Tutor Code of Conduct

All tutors who agree to tutor through Trusted Tutors online sessions are required to adhere to the following code of conduct:

- Tutors will only conduct online tutoring with their pupils at the designated tutoring times and dates allocated by Trusted Tutors.
- Tutors will conduct online tutoring either in a workplace or location that does not expose personal information or access to inappropriate background content.
- Tutors who are temporarily based abroad for work or educational purposes may request to continue tutoring during their time abroad. Only tutors who will be abroad for 6 weeks or less will be considered. Schools have the right to pause tutoring by tutors who are abroad if it conflicts with their own school policies.
- Tutors will be dressed appropriately in a manner that would be suitable for their attendance at a school in person.
- Tutors will keep their video stream 'on' and visible for the duration of their sessions.
- Tutors will not record video, still images or audio of any tutoring sessions.
- Tutors will not use the screenshare function.
- Tutors will never disclose their phone, email or other communication details with their pupil nor request similar details from their students through the online platform.
- Tutors will conduct their sessions without disruption (mobile phones should be set to silent and away from gaze) or supervision by any other persons not approved by Trusted Tutors.
- Tutors will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions and Trusted Tutors workbooks. If in doubt of the validity of any websites or material please get in touch with the Trusted Tutors team.
- Tutors will not take any screenshots of sessions.
- Tutors consent to the monitoring of all online sessions by Trusted Tutors staff either live or afterwards, in a systematic random review of safeguarding procedures.
- Tutors consent to the recording and safe storage of online sessions for six weeks past the date of recording, unless recordings are deemed to be needed by the DSL. This is for monitoring and safeguarding purposes only.
- Tutors will report any concerns about safeguarding or child protection as well as follow all Trusted Tutors safeguarding and child protection procedures, as outlined by this policy.
- Tutors will follow any additional requirements regarding digital working, as requested by individual school policies.

21.2 Online Pupil Code of Conduct

All schools who partner with Trusted Tutors agree to the following code of conduct for their pupils involved in online sessions:

- Pupils will only receive online tutoring at the designated tutoring times and dates allocated by Trusted Tutors, in agreement with their school.
- Pupils who receive online tutoring from their home shall do so with a parent or guardian present in the same room.
- Pupils will be dressed appropriately in either their uniform or in clothing appropriate to their attendance at a school event.

- Pupils who receive online tutoring at school shall do so with a responsible adult present and within listening distance.
- Pupils will conduct online tutoring either in a workplace or location that does not expose personal information.
- If broadband speed permits, pupils will keep their video stream 'on' for the duration of their session.
- Pupils will have any mobile phones on silent and out of gaze during sessions, or completely away as dictated by their school's policy.
- Pupils will not record video, still images or audio of any tutoring sessions.
- Pupils will never disclose their phone, email or other communication details to their tutor nor request those of their tutor through the online platform, or otherwise.
- Pupils will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions.
- Pupils will not take any screenshots of sessions.
- Pupils consent to the monitoring of all online sessions by Trusted Tutors staff, either live or afterwards in a systematic random review of safeguarding procedures.
- Pupils consent to the recording and safe storage of online sessions for six weeks past the date of recording, unless recordings are deemed to be needed by the Designated Safeguarding Officer. This is for monitoring and safeguarding purposes only.

21.3 Parent/Guardian and/or Responsible Adult Code of Conduct (for home-based online tutoring)

- Parents/Guardians or the named Responsible Adult of pupils in receipt of home-based tutoring, will remain at home and within 'listening-distance' for the duration of the tutoring session.
- If necessary, parents/Guardians or the named Responsible Adult, together with the support of the Trusted Tutors team, will support their child with basic IT set up.
- Parents/Guardians or the named Responsible Adult will support their child to attend and engage in as many online tutoring sessions as possible.
- Only pupils enrolled on the Trusted Tutors programme may be involved in online tutoring sessions with Trusted Tutors' tutors.
- Parents/Guardians or the named Responsible Adult will pass on any concerns about safeguarding immediately to the Trusted Tutors' Designated Safeguarding Lead, through natalie@trustedtutors.org.uk
- Parents/Guardians or the named Responsible Adult will ensure a safe, quiet and appropriate environment for online tutoring to take place at home, for their child.

22. Safeguarding Concerns and Allegations Made About Staff, Including Supply Teachers, Volunteers and Contractors

- Detailed guidance on handling allegations of abuse and low-level concerns made against staff members and tutors can be found in Keeping Children Safe in Education, 2025.
- Trusted Tutors recognises that it is possible for staff and tutors to behave in a way that might cause harm to children and takes seriously any allegation received. If a member of staff or a

tutor has a concern about another adult, including someone who works at Trusted Tutors, they should report immediately to the Trusted Tutors DSL or deputy DSL in their absence.

- In cases of allegations made against members of staff or tutors, the DSL should review the information available and consideration should be given as to whether the case meets the threshold of harm/risk of harm:
 - If it is decided it meets the threshold of harm/risk of harm and therefore is an allegation they should follow the procedures below and notify the LADO from the appropriate local authority, within one working day. If appropriate, because a law may have been broken, the police should also be notified without delay, or at least within one working day.
 - If it is decided that the incident does not meet the threshold of harm/risk of harm and is a concern only, then the Trusted Tutors DSL will take steps to ensure any conduct or behaviour issues are addressed with the member of staff or tutor, through normal company disciplinary procedures. The decision and a justification for it should be recorded by the DSL and safeguarding committee.
 - Any incident provoking what are usually described as ‘safeguarding concerns or allegations that do not meet the harm threshold’ or ‘low-level concerns’, will be recorded and managed as outlined in Part 4 of KCSIE, 2025.
 - If the designated safeguarding lead is unclear whether the incident meets the threshold, then the LADO will be consulted.

A clear and comprehensive summary of allegations and details of the subsequent actions taken should be kept on the confidential personnel file of the tutor or staff member. Details of allegations made against staff or tutors, subsequently found to have been malicious will be removed from records:

- The DSL should inform the accused person about the allegation as soon as possible after consulting the safeguarding committee (and, if necessary, the LADO or police). The DSL will provide the accused person with as much information as possible at that time, following guidance from the LADO and/or the Police, however, where a strategy discussion is needed, or police or children’s social care services need to be involved, ***the DSL will not give the accused person information about the allegation until those agencies have been consulted.*** Trusted Tutors will consider the situation carefully after taking advice from the LADO and/or a professional working in employment law, and will decide whether the circumstances of the case warrant an individual being suspended from contact with Trusted Tutors students, or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step.
- When an allegation is made, Trusted Tutors will ensure that every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- In the event of concerns or allegations about the DSL, CEO or Trusted Tutors’s handling of safeguarding concerns, allegations should be reported directly to the LADO of the local authority in which alleged the incident took place. Contacts for London Local authorities can also be found on the London Safeguarding Children Board website.

22.1 Whistleblowing

- All staff and tutors should feel able to raise concerns about poor or unsafe practice with the Trusted Tutors, and such concerns will always be taken seriously by the Safeguarding Committee.
- In the event of concerns or allegations about the DSL or Trusted Tutors's handling of safeguarding concerns, allegations should be reported directly to the remaining one of the three Trusted Tutors CEOs, or if that is inappropriate, to the local authority Designated Officer of the local authority where the incident occurred.
- All members of staff and tutors should be aware that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff and tutors can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk

23. Points of Contact

As Trusted Tutors works across boroughs in London and with students in multiple locations. Because of this not all local points of contact can be listed in this policy. In order to find the relevant local authority or point of contact, reference should be made to the online tool for finding relevant contact details: [Report Child Abuse to Your Local Council](#)

The following support agencies may be contacted by staff and tutors, as long as any query regarding a specific child, young person or family can be anonymised. If personalised information is required then contact must be made through liaison with the Trusted Tutors DSL(s).

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline Support for students
- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Citizens Commission on Human Rights: www.cchr.org.uk
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk - Support for adults
- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- National Association for People Abused in Childhood (NAPAC): napac.org.uk
- Mothers of Sexually Abused Children (MOSAC): www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Support for Learning Disabilities
- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- Domestic abuse services: www.domesticabuseservices.org.uk
- Honour based Violence
- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage> Sexual Abuse and CSE
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Child Exploitation and Online Protection (CEOP): www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk Online Safety
- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org
- Radicalisation and hate
- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism True Vision: www.report-it.org.uk

NB – Appendix B and Appendix C of KCSIE 2025 contain a number of additional points of contact that may be useful for both general staff members and DSLs to consult. Please see these appendices for links, including those to advice about teaching online safety; children sharing nudes and semi-nudes; the National Crime Agency's CEOP education programme, Thinkuknow; preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get support; the London Grid for Learning (LGFL) 'Undressed' guidance, which provides advice about how to teach young children about being tricked into getting undressed online, in a fun way and without explaining what the motives of a sex offender might be; the government guidance on forced marriage – The Right to Choose; The County Lines Toolkit For Professionals – Written by the Children's Society in partnership with Victim Support and the national Police Chief's Council; Operation Encompass; free resources about abuse from the CSA centre of Expertise on Child Sexual Abuse; and advice about the requirement for children to have access to an Appropriate Adult in certain situations, including when being interviewed by police.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place, in line with KCSIE, Trusted Tutors will be careful to ensure that 'over blocking' does not lead to unreasonable restrictions as to what our students can be taught with regard to teaching online teaching and safeguarding. At Trusted Tutors we keep this in mind when making decisions about the online sites and resources we use, when considering how best we limit the exposure of our students to online risks, and when talking to parents about their own filtering and monitoring choices.

Appendix 1: Some key definitions and indicators, mainly extracted and/or adapted from definitions contained within Keeping Children Safe in Education, 2025. This is important additional information on abuse, neglect and other safeguarding issues, including signs and symptoms and what to look out for.

- **Physical abuse** is a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
- **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. 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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual 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. 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 online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and **all** staff should be aware of it and their school or colleges policy and procedures for dealing with it.
- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos** (also known as youth produced sexual imagery) are all safeguarding issues.
- **Child-on-child abuse** can happen between children and young people of any age, both inside and outside of school or college, or online. Child-on-child abuse is most likely to include, but may not be 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 which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- **Child abduction** is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.
- **Community safety incidents in the vicinity of a school** can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

- **Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE)** and other forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. 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. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children: appear with unexplained gifts, money or new possessions; associate with other children involved in exploitation; suffer from changes in emotional well-being; misuse alcohol and other drugs; go missing for periods of time or regularly come home late, and regularly miss school or education or do not take part in education. Children who have been exploited will need additional support to help keep them in education. Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who: have older boyfriends or girlfriends; and suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)
- **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 - no specified distance of travel is required. 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.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are

exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity; owe a ‘debt bond’ to their exploiters; have their bank accounts used to facilitate drug dealing. Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#) and The Children’s Society [County Lines Toolkit For Professionals](#)

- **Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Children and families are often too frightened to give the evidence they are required to give. They may be threatened, either by the person they are required to give evidence against, or by another on behalf of that person.
- **Children who are absent from school or college,** particularly repeatedly and/or for prolonged periods, also **Children missing education,** can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called ‘honour’-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college’s unauthorised absence procedures and children missing education procedures.

In the UK, a **Child Missing Education (CME)** is legally defined as “any child of compulsory school age who is **not registered at a school and is not receiving a suitable education** in any other way”. **Compulsory School Age** begins on the first day of the school term following a child's fifth birthday, and ends on the last Friday in June of the school year during which they reach their 16th birthday.

The **"ten-day local authority reporting threshold"** most frequently refers to the statutory requirement for schools in England to formally report a pupil to the local authority as "at risk of missing in education" after **10 consecutive school days of continuous unauthorised absence**. Parents need to understand about this, as under the GOV.UK School Attendance Guide, this data must be monitored and they may receive a penalty notice.

- **Children with family members in prison** (approximately 200,000 children in England and Wales have a parent sent to prison each year) are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#), provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.
- **Cybercrime** is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include: unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded; ‘Denial of Service’ (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with

internet traffic from multiple sources, and, making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), ['NPCC- When to call the Police'](#) and [National Cyber Security Centre - NCSC.GOV.UK](#).

- The **Domestic Abuse** Act 2021 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, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent 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 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 can have a serious, long lasting emotional and psychological impact on children. 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'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any person under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones.
- **Homelessness** or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the

earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

- **Mental health issues**, where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can have a lasting impact throughout childhood and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school.
- **Modern slavery** encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK](#)
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability in terms of extremism, radicalisation and terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.
- **The Prevent Duty:** All schools and colleges are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism". The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should be aware of local procedures for making a Prevent referral. It is recommended that leads with designated Prevent responsibilities receive more in-depth training, including on extremist and terrorist ideologies to enable them to train and advise other staff and support making informed referrals to Prevent where necessary including the [GOV.UK Prevent duty training](#).
- **Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi- agency Channel panel, which will discuss the individual referral and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provide.
- **Sexual violence and sexual harassment** can occur between two children of any age and gender. It can also occur online or through a group of children sexually assaulting or sexually

harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- **Serious Violence:** There are a number of indicators, which may signal 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 and may be at risk of criminal exploitation. The likelihood of involvement in serious violence may be increased by factors such as: being male; having been frequently absent, or permanently excluded, from school; having experienced child maltreatment and having been involved in offending, such as theft or robbery. Violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.
- **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.
- **Female Genital Mutilation (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. The Female Genital Mutilation Act 2003 places a statutory duty upon **teachers**, to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. Use non-emergency police number 101 or emergency police number 999.
- **Breast ironing** is the practice of pounding down a young girl's breasts, often with hot stones, to delay or prevent development. It is mostly practiced in parts of Cameroon where males traditionally believe that girls whose breasts have begun to grow are ready for sex.
- **Forced 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. Schools and colleges can play an important role in safeguarding children from forced marriage. Since February 2024 the lowest legal age for marriage in the

UK has been 18 years, and no parental consent is necessary. In addition, since February 2024 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

- **'Upskirting'** and **'Downblousing'** are both non-consensual acts of using any device to capture images underneath a person's skirt or down their upper clothes, for sexual gratification or to deliberately cause the victim humiliation, distress or alarm. Both are illegal activities in the UK as they are considered to be serious forms of image-based sexual abuse and an invasion of privacy.