

## SAFEGUARDING AND CHILD PROTECTION POLICY

### Statement of Intent

Qualified Tutor is committed to working with children, young people, staff, volunteers, the community and relevant others to safeguard, protect and promote the welfare of children and young people and to give them the very best start in life, in line with statutory duties and responsibilities.

### Aims

We aim to:

- Create an inclusive environment at Qualified Tutor that encourages young people to develop a positive self-image and where children are safe, supported and protected regardless of race, age, disability, language, religion, culture and sexual orientation or other protected characteristic (in line with the Equality Act 2010);
- Establish and maintain an environment where young people feel safe and secure, are encouraged to talk, and are listened to when they have a worry or concern;
- Ensure young people know that there are adults in the school whom they can approach if they are worried;
- Help young people to establish and sustain satisfying relationships with their families, peers, and adults;
- Encourage young people to develop a sense of autonomy and independence;
- Empower young people to have the self-confidence, vocabulary and resilience to resist inappropriate approaches;
- Ensure all young people are provided with age appropriate skills and knowledge to recognise and stay safe from abuse;
- Ensure that young people who have been abused will be supported in line with a child protection plan as appropriate;
- Contribute to the five outcomes (Every Child Matters) which are key to every young person's wellbeing: be healthy, stay safe, enjoy and achieve, make a positive contribution, achieve economic wellbeing;
- Create an environment where knowledge of safeguarding policy and professional judgement is sound and used appropriately;
- Establish and maintain an environment where staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and well-being of a young person, the organisation's safeguarding regime or about the behaviour of a member of staff/volunteer and their proposed contributions to safeguarding procedures are considered (this includes supply staff);
- Establish and maintain an environment where safeguarding and promoting the welfare of young people including their mental health is everyone's responsibility and a child-centred approach is adopted whereby the best interests of the young people are paramount and all concerns are dealt with appropriately and in a timely manner;
- Inform staff, parents, volunteers and governors about the organisation's responsibilities for safeguarding young people, to enable everyone to have a clear understanding of how these responsibilities should be carried out
- Work with young people to build their understanding of and shared commitment to promoting and safeguarding the welfare of all our young people.

The legal framework and guidance for safeguarding and child protection is:

- **The Children Act 1989**
- **The Children Act 2004**
- **The Education Act 2002**
- **The Equality Act 2010**
- **PAN London Child Protection Procedures**
- **Barnet Three Safeguarding Partners' Inter-agency Child Protection and Safeguarding Children Procedures**
- **Keeping Children Safe in Education September 2020**
- **Working Together to Safeguard Children July 2018**
- **Working Together Transitional Statutory Guidance**
- **The Education (Pupil Information) (England) (Amendment) Regulations 2018**
- **Sexual Offences Act 2003**
- **Female Genital Mutilation Act 2003**
- **The Counter Terrorism and Security Act 2015**
- **Revised Prevent Duty Guidance: for England and Wales**
- **Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers**
- **What to do if you are worried a child is being abused – Advice for practitioners**
- **Ofsted's Education Inspection Framework**
- **Inspecting Safeguarding in Early Years, Education and Skills Settings**

#### **Liaison/Association with other Bodies**

- We acknowledge that we have a pivotal role to play in multi-agency safeguarding arrangements.
- We are aware that the safeguarding partners and child death review partner arrangements are in place in England. We work within the PAN London Child Protection Procedures and Barnet Three Safeguarding Partners' guidelines, a guide to statutory procedure and practice for all agencies in London and Barnet working with children and families. The Three Safeguarding Partners (the local authority, clinical commissioning group for an area within the local authority, chief officer of police for a police area in the local authority) have a shared and equal duty to work together with other agencies to safeguard and promote the welfare of local children.
- Staff are aware that they can view the Barnet Three Safeguarding Partners' threshold document for reporting online: <https://thebarnetscp.org.uk/bscp/professionals/barnet-continuum-of-support>
- All staff/volunteers are familiar with and follow the Barnet Three Safeguarding Partners' guidelines including identifying and responding to the needs of young people.
- We notify the HSE and registration authority (DfE and Ofsted) of any reportable incident or accident and any changes in our arrangements which affect the wellbeing of children (*RIDDOR*)
- We have procedures for contacting the local authority (Barnet) on safeguarding and child protection issues, the Multi-Agency Safeguarding Hub (MASH Team): 020 8359 4066 (Mon-Thurs 9am-5.15pm, Fri 9am-5pm)  
Out of Hours: 020 8359 2000
- If a report is to be made to the authorities, we act within the Barnet Three Safeguarding Partners' guidelines in deciding whether to inform the young people's parents at the time of the referral (i.e. only if doing so would not place the young people/staff at further risk of harm).
- We develop effective working relationships with the Three Safeguarding Partners, other agencies and services such as Barnet children's social services to promote the welfare of children (including mental health) and protect them from harm and contribute to and co-operate with inter-agency plans such as by sharing information where children are subject to child protection plans.

- Qualified Tutor forms a part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so and looking at alternatives where it is not, whilst acting in the best interests of the child at all times.
- Contextual safeguarding is used to consider the context within which safeguarding incidents/behaviours occur, assessments of children consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare and interventions focus on addressing these wider environmental factors; hence the need to provide as much information as possible in the referral process, full context of any abuse. All staff are aware that safeguarding incidents/behaviours can be associated with factors outside the organisation and/or can occur between young people outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) consider whether young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and young people can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### **Staff Responsibilities**

#### ***Company Founder/ Director***

The Company Founder/ Director has overall responsibility to:

- Adopt effective policies and procedures (updated annually) for Qualified Tutor with regard to safeguarding and child protection;
- Be familiar with and follow local arrangements for safeguarding and child protection and ensure that the school contributes to multi-agency working in line with statutory guidance;
- As Designated Safeguarding Lead, manage safeguarding and child protection in the organisation
- Sufficient resources and time are allocated for staff/volunteers to carry out their duties and responsibilities effectively;
- All staff/volunteers and adult helpers in the school are able to voice their concern if they feel that a child is vulnerable, or there are any particular practices that are unsafe.

#### ***Designated Lead for Child Protection***

There is a senior named person nominated as the Designated Safeguarding Lead for safeguarding and child protection as well as Deputies (see below) appointed by the Governing Body. They are guided by two principles:

1. In accordance with the Children Act, the welfare of the child is always paramount
2. Confidentiality should be respected as far as possible but can never be absolute

#### ***Role of the Designated Safeguarding Lead for Child Protection***

- Take lead responsibility for safeguarding and child protection (including the Prevent duty, online safety and child on child sexual violence and harassment), oversee and co-ordinate child protection systems within the school
- Delegate safeguarding related work to the Deputy Safeguarding Officers as appropriate
- Develop and maintain a culture of safeguarding in the school
- Liaise, work with, make and manage referrals to the Three Safeguarding Partners and relevant agencies where necessary in line with Working Together to Safeguard Children (including safeguarding and specialist services - MASH, the police – where a crime may have been committed and/or a child is in immediate danger (the document 'NPCC- When to call the police' should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do), health services, Channel programme – radicalisation concern) and follow up, review and re-refer as appropriate/required to ensure the child's circumstances improve (follow procedures set out in the Barnet Three Safeguarding Partners' Multi-Agency Escalation Policy and Resolution Policy) including contributing to LA child protection case/review conferences
- Refer to the DBS cases where a member of staff/volunteer is dismissed or left due to their causing risk/harm to a child (who will consider whether to bar the person)

- Ensure all referrals are made in accordance with the reporting thresholds set by the Three Safeguarding Partners in Barnet
- Complete annual safeguarding and case work audits, be accountable and share recommendations for improvement with across the organisation
- Provide advice, support and guidance to staff/volunteers on safeguarding and child protection issues (including the Prevent duty and online safety) and making referrals
- Ensure the DSL or DSO is available at all times for staff in the school to discuss any safeguarding concerns and in the event that they will not be available during these times, arrange adequate and appropriate cover
- Ensure the organisation's safeguarding & child protection policy and procedures are up to date and consistent with statutory requirements, the PAN London Child Protection Procedures and the Barnet Three Safeguarding Partners' policy and procedures, procedures and implementation are updated and reviewed regularly and that the safeguarding and child protection policy is reviewed annually
- Ensure all staff/volunteers and visitors, are aware of and understand the organisation's arrangements for safeguarding and child protection including whistleblowing, are able to implement these policies and procedures appropriately and comply with them; ensure regular staff/volunteer appraisals are robust and include safeguarding (*See Staff Performance and Management Policy for further details*)
- Ensure contextual safeguarding is utilised
- Deal with all concerns raised through the internal reporting system which includes safeguarding, behavioural incidents (e.g. bullying), e-safety concerns, racist and general incidents, provide advice and guidance to staff and the SLT on how to best support the child
- Attend training to acquire the requisite working knowledge & skills to carry out the role including local safeguarding & child protection procedures and working practices (such as referrals to follow, working knowledge of how the LA conduct a child protection case conference and a child protection review conference), online safety as well as Prevent awareness training. Formal training should be updated every 2 years to keep up to date with new policy and emerging issues. In addition, knowledge and skills must be regularly refreshed (minimum annually) to keep up with safeguarding developments e.g. via e-bulletins, meeting DSLs from other organisations, reading related material etc. (sources of information available via the web include gov.uk, the NSPCC and 'educate against hate')
- Engage and link with the Three Safeguarding Partners and/or other sources of safeguarding related training and information to attend and offer training opportunities to staff as appropriate and to be aware of changes/additions to local policies and safeguarding arrangements
- Ensure the Deputy Safeguarding Officers are trained and training is refreshed to the same level (as the DSL) and work within the requisite legal framework
- Ensure staff/volunteers receive appropriate safeguarding and child protection training at induction as well as annual refresher training which includes the Prevent duty and online safety (e.g. via insets, email, e-bulletins, staff meetings)
- Understand the unique risks associated with online safety and have the relevant and up to date knowledge and skills required to keep children safe while they are online at school, including children with SEND
- Offer children identified as having been victims of child on child sexual violence and harassment a Designated Trusted Adult (DTA) such as their former teacher with whom to talk to about their needs where it is clear that ongoing support will be required to encourage the victim/s to disclose the whole picture
- Have an awareness of those children looked after by the LA (LAC), children in need, children in need of protection, young carers, children who have special educational needs and/or disabilities, children who have additional needs and manage early help including a CAF referral where appropriate
- Notify the LA where a private fostering arrangement is discovered (the LA will check that the arrangement is suitable and safe for the child)
- Oversee the teaching of safeguarding to young people via our courses online safety, cyberbullying and the development of positive relationships between peers in age and culturally appropriate ways, ensure young people know how to complain and express their views and that a range of means are available to them and that they will be listened to and appropriate responses put in place.

- Ensure accurate records are kept of all safeguarding concerns, discussions and decisions/actions (including the justifications of decisions/actions) and are stored in a secure place that facilitates strict confidentiality with restricted access to authorised persons only

The Deputy Safeguarding Officers are a point of contact for safeguarding and child protection concerns and are trained to the same standard as the Designated Safeguarding Lead. In addition, the Designated Safeguarding Lead may delegate safeguarding related work to the Deputies. The ultimate lead responsibility remains with the Designated Safeguarding Lead, a responsibility that is not delegated. The Deputy Safeguarding Officers work within the requisite legal framework as does the DSL.

### **Staff**

All staff/volunteers have a responsibility to report to the Designated Safeguarding Lead or a member of the organisation's Child Protection Team **ANY concern** they have about the safety and welfare of any young person involved in the organisation **WITHOUT delay** (even if they are unsure whether the concern is legitimate) and to be prepared to support other agencies and professionals following a referral. Where a member of staff/volunteer becomes aware that a pupil might be in a private fostering arrangement (where a child is provided with care and accommodation in the home of a non-relative for 28 days or more), they should report this to the DSL.

### **Employment and Recruitment**

We do all we can to ensure that all those working with young people in our organisation are suitable to do so. We follow safer recruitment guidance set out in Keeping Children Safe in Education, September 2020. This includes scrutinising applicants, verifying their identity and obtaining references, mandatory criminal records DBS checks, disqualification check for staff/volunteers involved in the provision/management of childcare as well as requisite record retention of staff information and checks. If staff are found to have a criminal record, the appointment is reconsidered by the Company Founder and if already appointed, this record or any misinformation that comes to light from their application may result in dismissal. Any offer of appointment made to a successful candidate is conditional on satisfactory completion and outcomes of **ALL** the necessary pre-employment checks. Where there are concerns about the suitability of an existing member of staff/volunteer, we carry out all relevant pre-employment checks again. Proportionate decisions are taken with regard to safer recruitment on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. (*See Safer Recruitment Policy for further details*)

### **Staffing and Volunteering**

- Our Designated Safeguarding Lead is Mrs Julia Silver (07970485294), Deputy is Adrian Conway 07540 687232. We provide adequate and appropriate staffing to meet the needs of our children.
- Applicants for posts at Qualified Tutor are clearly advised that the positions are exempt from the Rehabilitation of Offenders Act 1974. Candidates are informed of the need for the school to carry out checks before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.
- We abide by statutory requirements in respect of references and police checks for staff and volunteers to ensure that no disqualified person works at Qualified Tutor or has access to young people.
- Staff/volunteers/supply staff/contractors/contractors' staff do not work unsupervised unless an enhanced DBS with barred list check has been carried out and is satisfactory i.e. for those engaged in regulated activity. Consistent and adequate supervision is always performed by a member of staff/volunteer with a valid enhanced DBS and who is in regulated activity, thereby ensuring optimum protection of children. Where staff/volunteers move from non-regulated to regulated activity, an enhanced DBS check is carried out.
- We ensure that staff, supply staff and volunteers (without an enhanced DBS certificate which includes barred list information) are appropriately supervised and do not take children to the toilet.

- We abide by statutory requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal due to child protection concerns such as referral to the DBS by the DSL.
- We have robust security provisions in place to ensure that we have control over who comes into our Zoom events and community space so that no unauthorised person has unsupervised access to the young people.

### **Disciplinary Action**

Whenever it is alleged that a member of staff/volunteer has:

- Behaved in a way that has or may have harmed a young person
- Possibly committed a criminal offence against/relating to a young person
- Behaved towards a young person/ people in a way that indicates he or she may pose a risk of harm to young person; or
- Behaved or may have behaved in a way that indicates they he or so may not be suitable to work with young people (transferable risk),

the person to whom the allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Action to be taken includes making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Company Founder Juila Silver (07970 485 294).

If any member of staff/volunteer has reason to suspect that another member of staff/volunteer may have abused a young person at the organisation, or elsewhere (i.e. this applies to any young person the member of staff/volunteer has contact with in their personal, professional or community life), s/he must immediately inform the Company Founder. It is the professional responsibility of all staff and volunteers to challenge any unsafe practices and report them as above. *(See Whistleblowing Policy for further details)*

If the concerns are about the Company Founder, then the NSPCC should be contacted.

The recipient of an allegation must **not** unilaterally determine its validity and failure to report it in accordance with procedures is a potential disciplinary matter.

The Company Founder will not investigate the allegation itself, nor take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer: 020 8359 4066 (i.e. the LADO, who has lead responsibility for overseeing and dealing with allegations including inter-agency liaison, providing support, monitoring progress and ensuring a thorough, fair and prompt process). Many cases might not meet the threshold for external reporting. If the allegation meets any of the three criteria set out above, contact should always be made with the Local Authority Designated Officer without delay. (In rare cases such as where the accused person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may want to involve children's social services and/or the police immediately.)

Following consultation with the LADO, if it is decided that the allegation meets the threshold for safeguarding, this will take place in accordance with the Barnet Three Safeguarding Partners' Inter-agency Child Protection and Safeguarding Children Procedures.

If it is decided that the allegation does not meet the threshold for safeguarding and does not involve a possible criminal offence, the LADO will advise the options open to the school to deal with the situation via the school's internal procedures.

Accurate record-keeping of all decisions/actions at every stage as well as of their justifications is imperative. All allegations, aside from those found to be malicious, should be confidentially recorded in the personnel file of the accused person to be accessed for future reference as appropriate and a copy of these records should be provided to him/her. False, unsubstantiated or malicious allegations should not be included in employer references.

Historical allegations of abuse that are reported/come to light after a member of staff/volunteer has left Qualified Tutor should be referred to the police.

The case manager should, as soon as possible, **following briefing** from the Local Authority Designated Officer, inform the accused person and the parents/carers of the child/children involved about the allegation and provide them with as much information as the LADO deems permissible to disclose at that point. The case manager will deal with the allegation promptly and fairly, keep relevant persons updated of progress where permitted, ensure a thorough and consistent investigation and effective protection for the child/children.

Confidentiality about allegations made against staff/volunteers whilst investigations are ongoing is mandatory, including for parents/carers, until reporting restrictions are legally lifted.

Where it is alleged that a young person/ people may have suffered significant harm or there may be criminal prosecution, support should be provided to the young person/ people as appropriate (with input from MASH and/or police as appropriate). It is imperative to reach and record a conclusion in all cases of allegations wherever possible and as quickly as possible and to give the accused person the opportunity to represent his/her side.

If an allegation is made against a staff member/volunteer it is advisable for him/her, about whom the complaint is made, to gain legal and union advice.

*For further information, see:*

*Barnet Three Safeguarding Partners Inter-agency Child Protection and Safeguarding Children Procedures for Managing Allegations Against Adults who work with Children and Young People*  
*Managing Allegations Against Staff Policy*

## **Training**

We encourage and support a culture of listening and responding to young people and taking account of their wishes and feelings. We seek out training opportunities for all adults involved at Qualified Tutor to ensure that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse, neglect or radicalisation and of the appropriate procedures to follow. All staff/volunteers at Qualified Tutor should know the procedures for reporting and recording their concerns as well as their role in the case of statutory assessments. The DSL and DSOs undertake formal training at two-yearly intervals to keep knowledge and skills up to date. The DSL is responsible for ensuring that all staff/volunteers who work with young people receive appropriate training, which is refreshed annually and regular updates delivered to all staff as and when required. Staff have the opportunity to contribute to and shape the safeguarding arrangements and policy at Qualified Tutor and should present their ideas and insight to the DSL for consideration.

All newly appointed staff undergo safeguarding and child protection training at induction prior to or on their first day of employment, which includes policy and procedures on whistleblowing, staff code of conduct and the role of DSL (including the child protection team members). This makes them aware of the school's arrangements for child protection and provides sufficient knowledge and guidance to enable them to meet their responsibilities in safeguarding children which includes the Prevent duty and online safety. (Copies of policies and a copy of Part One: Keeping Children Safe in Education and Annex A is provided to staff at induction and the latter must be read in line with and as a further annex to this policy). Further safeguarding supervision takes place at regular intervals during staff/volunteer appraisal/supervision meetings to identify any required training, clarification of policies and

procedures, check for any concerns and to ensure robust competence in safeguarding duty of all staff. Volunteers, supply and external staff are made aware of the school's safeguarding policies and procedures by the Designated Safeguarding Lead and sufficient information clarifying the school's arrangements for safeguarding and child protection is given to them. The visitor badge has the name and number of the DSL. There is a visitor board with the child protection team poster with information regarding our arrangements for safeguarding and child protection. The information given to all staff, volunteers and visitors is sufficient to enable them to fulfil their role in promoting and protecting the welfare of children at Beis Chinuch. All training and briefing is in line with Barnet Three Safeguarding Partners' guidelines.

Where staff identify that a child may benefit from early help, to provide support at the onset of a problem and to prevent escalation of additional needs and crisis, they should discuss early help requirements with the DSL and be prepared to support other agencies and professionals in an early help assessment CAF (Common Assessment Framework). Staff and volunteers should be alert to the potential need for early help for young people who are more vulnerable such as young people with special education needs, disability, specific additional needs, young carers, showing signs of engaging in anti-social or criminal behaviour, challenging family circumstances such as substance abuse, adult mental health and/or learning disability, domestic violence or young people who are showing early signs of abuse and/or neglect.

### Complaints

- We follow the guidelines of the Barnet Three Safeguarding Partners when investigating any complaint that a member of staff or volunteer has/may have abused a young person and ensure an unbiased, impartial process/outcome. (*See Managing Allegations Against Staff Policy for further details*)

### Responding to Suspicions of Abuse

- All staff and volunteers are aware that abuse of young people can take different forms – physical (this may involve any action causing harm – hitting, biting etc. - or when a parent/carer deliberately fabricates symptoms of illness or induces illness in a young person), emotional (emotional maltreatment which might cause severe and persistent adverse effects, can be developmentally inappropriate expectations or overprotection, conveying feelings that the young people is unloved, inadequate etc.), sexual (this may involve physical contact or non-contact activities) and neglect (not meeting basic needs e.g. food, clean clothing, left alone etc.). All staff and volunteers should be concerned about a young person if s/he presents with indicators of possible significant harm – *see Appendix 3 for details*.
- When young people are suffering from physical, sexual or emotional abuse or experiencing neglect, this may be demonstrated through the things they say (direct or indirect disclosure) or through changes in their behaviour or play. Generally, in an abusive relationship the young person may appear frightened of the parent/s or other household members e.g. siblings or others outside of the home, act in a way that is inappropriate to her/his age and stage of development (full account needs to be taken of different development patterns and different ethnic groups), display insufficient sense of 'boundaries', lack stranger awareness, appear wary of adults and display 'frozen watchfulness'.  
Where such evidence is apparent, or where young people's behaviour/speech/presentation gives cause for concern, the member of staff/volunteer should make a dated record of the details of the concern **on the same day** (Concern Form) and contact the DSL **promptly** who will investigate and make referrals as appropriate.
- We ensure investigation is carried out with sensitivity. We ensure the young person's wishes and feelings are taken into account when determining course of action. We encourage young people to express their views and ensure that they are listened to and that their best interests remain paramount. Staff/volunteers at Qualified Tutor take care not to influence the outcome neither through the way they speak to young people nor by the way they ask questions to children. Where a child shows signs and symptoms of "failure to thrive" or neglect, the DSL will make appropriate referrals.



## Disclosures

Where a young person makes a disclosure to a member of staff/volunteer that s/he has been harmed/abused/neglected in some way, that member of staff/volunteer should:

- Listen to the young person, to what is being said, without displaying shock or disbelief
- Accept what is being said
- Allow the young person to talk freely
- Reassure the young person, but not make promises that might not be possible to keep
- Never promise a young person not to tell anyone - this may ultimately not be in the best interest of the young person
- Reassure him/her that what has happened is not his/her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make an accurate, written record as soon as possible
- Pass the information to the Designated Safeguarding Lead (Julia Silver) or to the Deputy Safeguarding Officers (Adrian Conway) without delay.

Support for Staff and Volunteers: Dealing with a disclosure/safeguarding issues can be stressful. The member of staff/volunteer should therefore consider seeking support for him/herself and discuss this with the Designated Safeguarding Lead.

## Recording Suspicions of Abuse and Disclosures

When a young person makes a disclosure or staff/volunteers have safeguarding concerns about a young person, the member of staff/volunteer should make an accurate, clear and factual record as follows:

- Make brief notes as soon as possible after the conversation/observation. Use the Qualified Tutor 'Concern Form' wherever possible – a further audit will be completed by the DSL as appropriate
- Don't destroy original notes in case they are needed by court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the young person
- Draw a diagram to indicate the position of any injuries
- Record statements and observations rather than interpretations or assumptions
- Record the names of any other person present at the time

All records need to be given to the DSL promptly. No copies should be retained by the member of staff/volunteer. Accurate record-keeping of all concerns, discussions, decisions/actions as well as of their justifications is imperative. If in doubt about recording requirements, staff/volunteers should discuss with the DSL. The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) (Amendment) Regulations 2018 and Data Protection Act 2018. Safeguarding records should be signed and dated and kept securely in a designated confidential file, separate from academic files.

All staff and volunteers should know the procedures for recording and reporting. The Designated Safeguarding Lead will usually decide the appropriate action to take, whether to refer to the local authority, police etc. **If a young person is in immediate danger or is at risk of harm, a referral must be made to MASH and/or the police immediately and reported to the DSL promptly.**

## Informing Parents

Parents should be informed by the DSL prior to referral, unless it is identified that doing so might compromise the safety of a young person/member of staff. In line with the Barnet Three Safeguarding Partners' guidelines, parents might not be advised of the disclosure where it has been identified that doing so might place the young person/member of staff at risk of significant harm by: the behavioural response it prompts e.g. a young person being subjected to abuse, maltreatment/threats or forced to remain silent if the alleged abuser is informed (e.g. where the parent is the likely abuser), leading to an unreasonable delay or risk of loss of evidential material. In such cases, the statutory investigating officers will inform the parents.

### **Confidentiality**

All concerns and investigations should be kept confidential and shared only with those who need to know. When sharing information, we ensure that the guidelines of the Barnet Three Safeguarding Partners are followed.

- All staff and volunteers in Qualified Tutor, have a responsibility to share relevant information about the protection of young people with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police). This is especially important in the case of child sexual exploitation.
- If a young person confides in a member of staff/volunteer and requests that the information be kept secret, it is important that the member of staff/volunteer tells the young person that s/he cannot promise complete confidentiality – instead s/he must explain that s/he may need to pass information to other professionals in order to keep the young person or other young people safe. This will ultimately be in the best interests of the young person.
- Staff/volunteers who receive/are privy to information about young people and their families in the course of their work should share that information **only** within appropriate professional contexts.
- The Data Protection Act 2018 and GDPR do not prevent the sharing or withholding of information for the purposes of keeping children safe including special category personal data (sensitive data). Staff/volunteers are aware that 'safeguarding of children and individuals at risk' is a processing condition that allows them to share special category personal data. This also applies to sharing without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a young person in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a young person at risk. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

*See Data Protection Policy for further details*

### **Mental Health**

All staff/volunteers are aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Although only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff/volunteers are well placed to observe young people and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

### **Radicalisation**

Radicalisation is a process by which a person comes to support terrorism and forms of extremism (including via the internet and social media) during which it is possible to intervene to prevent the person from being radicalised. We acknowledge our duty under the Counter-Terrorism and Security Act 2015 (the CTSA 2015) to ensure that staff receive training on the Prevent duty as part of safeguarding training and complete the 'Channel General Awareness' e-learning programme (which explains the risks of radicalisation, identifying individuals at risk of being drawn into terrorism, how to support them and challenge extremist ideas) and that as a school we promote British Values (*see Promoting British Values Policy*). Staff should discuss any concerns they may have about a child they

believe is vulnerable to/engaged in radicalisation with the Designated Safeguarding Lead who will provide guidance and make the appropriate referrals (such as to the Channel programme) and follow up. As with other safeguarding concerns, staff/volunteers should follow the same procedures for reporting and/or dealing with concerns about a child at risk of or in the process of being radicalised. 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 and report their concerns to the DSL or DSOs.

### **Online Safety**

We acknowledge that the use of technology has become a significant component of many safeguarding issues; technology often provides the platform that facilitates harm.

Three identified areas of risk in this area are:

-content: exposure to illegal, inappropriate or harmful material e.g. pornography, extremist views

-contact: harmful online interaction e.g. adults posing as children or young adults

-conduct: personal online behaviour that increases the likelihood of or causes harm e.g. online bullying

We ensure that children are safeguarded from potentially harmful and inappropriate online material and to this effect we have suitable filters and monitoring systems in place that safeguard without over-blocking that which is beneficial to teaching and learning. (*See e-Policy for further details*). Staff safeguarding training includes online safety to enable staff to understand the unique risks associated with online safety and to be confident that they have the relevant up to date knowledge and skills required to keep children safe while they are online.

### **Child on Child Sexual Violence and Sexual Harassment**

We are aware that young people can abuse other young people (peer on peer abuse). Child on child sexual violence is a sexual offence under the Sexual Offences Act 2003 and includes sexual assault. Sexual harassment refers to unwanted conduct of a sexual nature such as sexual comments, remarks and jokes. This can also include an online element, sexting (also known as youth produced sexual imagery), initiation/hazing type violence and rituals as well as upskirting (taking a picture under a person's clothing without them knowing for sexual gratification or to cause the victim humiliation, distress or alarm). Child on child sexual violence and sexual harassment can occur between two children of any age and gender, through a group of children sexually assaulting or sexually harassing a single child or group of children, as stand-alone or part of a broader pattern of abuse. We deal with cases of child on child sexual violence and harassment via the general school protocol for responding to disclosures or suspicions of abuse. Where the violence or harassment includes an online element, staff should not view or forward illegal images of a child i.e. extreme or child pornography, rather they should give the material to the police. If it is clear that ongoing support will be required to encourage the victim/s to disclose the whole picture, the Designated Safeguarding Lead will offer the child/children a Designated Trusted Adult (DTA) such as their former teacher with whom to talk to about their needs.

### **Serious Violence**

Staff/volunteers are aware of the signs that may indicate that a child is at risk from or involved with serious violent crime. Staff/volunteers are aware of the associated risks to children from serious violence and understand the measures in place to report and manage these.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation: County Lines (CCE)**

All staff/volunteers are aware that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal

activity. The abuse 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. Victims can be exploited even when activity appears consensual and it should be noted that exploitation as well as being physical can be facilitated and/or take place online.

We are aware that drug networks and gangs can exploit young people to transport drugs and money. The DSL will make a referral to the National Referral Mechanism (NRM) where this is suspected or discovered. The NRM is a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support.

## **COVID-19**

Qualified Tutor are aware of the added stressors and risks to the wellbeing of pupils during the COVID-19 pandemic and national lockdown and in line with this staff/volunteers have been trained by the DSL to be extra vigilant and look out for young people who may be experiencing maltreatment, anxiety or other issues. Staff/volunteers ensure that they remain in regular contact with all children in their year group and offer pastoral care. Reporting procedures remain as previous.

## **APPENDIX 1 – SPECIFIC SAFEGUARDING ISSUES**

Staff/volunteers must be aware of the indicators of specific safeguarding issues that put children in danger as outlined in this policy, Keeping Children Safe in Education Part 1 & Annex A, safeguarding induction and safeguarding training, so that they are able to identify cases of children who may be in need of help or protection.

Examples of specific safeguarding issues are as follows:

- Children Missing Education (CME)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation: County Lines
- Homelessness or Risk of becoming Homeless
- Domestic Abuse
- Honour-Based Violence (HBV)
- FGM mandatory reporting duty
- Forced Marriage
- Preventing Radicalisation
- Contextual Safeguarding
- Online Safety
- Child on Child Sexual Violence and Sexual Harassment
- Serious Violence
- Looked After Children (LAC) and Previously Looked After Children
- Children with SEND

## **APPENDIX 2 – FRAMEWORK FOR UNDERSTANDING CHILDREN'S NEEDS**



### APPENDIX 3 - INDICATORS OF HARM

Staff/volunteers should be aware that abuse, neglect and other safeguarding issues are generally not isolated events but rather a series of overlapping issues. Abuse or neglect of a child may occur by inflicted harm or by failure to act to prevent harm. Children may be abused in a family, institutional, community or other setting by those known to them or sometimes by unfamiliar persons.

Domestic abuse involves controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over and can include psychological, physical, sexual, financial and emotional abuse. Exposure to domestic abuse and/or violence can have serious, long-lasting emotional and psychological impact on children. A child may blame him/herself for the abuse and may have had to leave the family home as a result.

Faith abuse can occur as a result of using the belief in magic, the supernatural, witchcraft, the evil eye etc. as reason to harm a child.

A child may suffer abuse by an adult/adults or by another child/children (i.e. by multiple perpetrators) e.g. peer on peer abuse.

We take bullying very seriously. Bullying involves the persistent physical or verbal abuse of another child or children and can include any form of persistent teasing or name-calling, racism, gender based violence, sexting (also known as youth produced sexual imagery), cyberbullying, physical attack or threatening behaviour. A child who is bullying has reached a stage of cognitive development where s/he is able to plan and carry out a premeditated intent to cause distress to another. All staff/volunteers must be vigilant and active to prevent pupils being bullied and **ALL** incidents must be logged on a 'Concern Form' and passed on to the Designated Safeguarding Lead **PROMPTLY WITHOUT DELAY**. Children are encouraged to report all incidents, are listened to and made to feel safe and secure. Staff/volunteers seek further advice from the Designated Safeguarding Lead and/or SLT as on how to best support the child as appropriate. The Designated Safeguarding Lead and/or SLT will deal with any incidents of bullying promptly. (See Anti-Bullying Policy for further details)

**This policy was approved by the Qualified Tutor Company Founder Julia Silver**

**July 2020**

**Review Frequency: ANNUAL**

