TUTOR IN A BOX
SAFEGUARDING POLICY AND PROCEDURES

Introduction	Tutor In A Box recognises the importance of a strong and safe community and recognises the right of every individual to stay safe. Tutor In A Box comes into contact with children and / or vulnerable adults through providing 1-1 and small group tuition. This policy seeks to ensure that Tutor In A Box undertakes its responsibilities with regard to protection of children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation's expectations.
Child Protection Statement	Tutor In A Box values young people and children as being a vital part of the organisation and desires to see them grow, mature and be challenged in a healthy and safe environment. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. **Principles** ● Safeguarding is everyone's responsibility ● Tutor In A Box's responsibility to safeguard and promote the welfare of children is of paramount importance. ● All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection. ● Children who are safe and feel safe are better equipped to learn. ● All adults at Tutor In A Box are required to take all welfare concerns seriously and to encourage children and young people to talk to them about anything that worries them. ● Staff will always act in the best interests of children. ● It is vital that all staff are alert to the signs of abuse, are approachable and trusted by students, listen actively to children and understand the procedures for reporting their concerns. ● If, at any point, there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care and/or the Police immediately. **Anybody can make a referral**. If the child's situation does not appear to be improving, any staff member with concerns should press the Designated Safeguarding Lead (DSL) for re-consideration. ● If a member of staff remains concerned about a child, they can discuss their concerns with another DSL or contact the MASH Education Lead for additional advice as necessary. ● This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review. **Aims** ● To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities. ● To ensure consistent good practice. ● To demonstrate Tutor In A Box/college's commitment with regard to safeguarding and child protection to students, parents and other partners.

Legislation	
	This policy is based on legislation, policy and guidance that seeks to protect children in England, including: ● The Children Act (1989 and 2004) ● Working Together to Safeguard Children 2018 ● Keeping Children Safe in Education 2022 ● The Children and Social Work Act 2017 ● The United Nations convention on the Rights of the Child 1992 ● The Equality Act 2010 ● The Children and Families Act 2014 ● The Human Rights Act 1998 ● What to do if you're worried a child is being abused: guidance from Department for Education (2015) ● NSPCC website This policy statement should be read alongside other related documents, including: ● Whistleblowing Policy ● Staff Behaviour Policy (including additional for tutors) ● Health & Safety Policy ● Quality Assurance Policy ● Data Protection Policy ● Data Breach Policy

Definitions	Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.
	Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.
	It can take a number of forms, including the following: ● Physical abuse ● Sexual abuse ● Emotional abuse ● Bullying ● Neglect ● Financial (or material) abuse
	The following definitions of the above terms are taken from Keeping Children Safe in Education 2022
	Abuse: a form of maltreatment of a child.
	Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
	Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
	Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
	Emotional abuse: 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, 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. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The NSPCC outlines the common signs of child abuse as:
- Unexplained changes in behaviour or personality.
- Becoming withdrawn.
- Seeming anxious.
- Becoming uncharacteristically aggressive.
- Lacks social skills and has few friends, if any.
- Poor bond or relationship with a parent.
- Knowledge of adult issues inappropriate for their age.
- Running away or going missing.
- Always choosing to wear clothes which cover their body.

For more information, you can visit the NSPCC website.

Definition of a child
A child is under the age of 18 (as defined in the United Nations convention on the Rights of a Child).

Definition of Vulnerable Adults
A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.
This **may** include a person who:
- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability

	● Has a learning disability ● Has a severe physical illness ● Is a substance misuser ● Is homeless
Responsibilities	**All staff** (paid or unpaid) have responsibility to follow the guidance provided in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices. All staff will handle all information with sensitivity and confidentiality and in accordance with GDPR guidelines. All staff will follow the safeguarding procedure (Appendix 1) when recording a concern. **Additional specific responsibilities:** **Designated Safeguarding Lead (DSL) - Amandine Stone** Contact: amandine@tutorinabox.co.uk 07462 059 870 **Deputy Designated Safeguarding Lead - Sophie Parker** Contact: sophie@tutorinabox.co.uk

| The role of the Designated Safeguarding Lead (DSL) | Tutor In A Box has an appointed designated safeguarding lead (DSL) who is responsible for receiving, dealing with and acting upon any concerns raised about the welfare and protection of children. They will undertake appropriate DSL training and this will be updated every year. Tutor In A Box has an appointed Deputy DSL who will take over the responsibilities of the DSL in their absence. They will be trained to the same level as the DSL.

The role of the DSL is to:
1. Know which outside child protection agency/ies to contact in the event of a child protection concern being raised or brought to the notice of Tutor In A Box.
2. Provide, promote, inform and advise on safeguarding and child protection within Tutor In A Box and provide regular updates and training to staff
3. Ensure that appropriate information is available at the time of incident/concern reporting and that the incident/concern is confirmed in writing.
4. Ensure that the appropriate legislative body such as Police, LADO, Social Services or Barring list is notified of a referral/incident/concern in a timely manner.
5. Ensure that any confidential data associated with safeguarding is stored safely and securely, in line with all Data Protection policies and procedures.
6. Keep relevant people within Tutor In A Box informed about any action taken and any further action required; for example, disciplinary action against a member of staff. This should be timely and appropriate depending on the severity of the case and circumstances.
7. Review the operation of the Safeguarding Policy and procedures regularly to ensure the procedures are working and that Tutor In A Box are compliant and operating within best practice.
8. The DSL and Deputy DSL must be appropriately trained and must advise relevant stakeholders within the organisation of any significant legislation changes that may affect Tutor In A Box's current operations.
9. In the DSL's absence, the deputy DSL will carry out DSL duties by following all outlined procedures |

Safer Recruitment	The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include:
	● Whistleblowing policy
	● Staff Behaviour Policy (including additional for tutors)
	● Health and safety policy
	● Equal opportunities policy (within employee handbook)
	● Data protection policies
	● Confidentiality and staff induction / training
	This particular section focuses on Safer recruitment.
	The safe recruitment of staff is an important initial step to safeguarding the welfare of children in education. Therefore, Tutor In A Box will follow the safer recruitment guidelines to deter unsuitable applicants, reject inappropriate candidates and prevent abuse to young people. We do this by ensuring our application process only attracts the right people and that any individual who is not suitable is rejected. We then implement policies and guidance to prevent abuse.
	A single centralised record of recruitment and vetting checks is kept in accordance with the Education (Independent School Standards) Regulations 2014 requirements. This is so that all information is easily accessible and to ensure that all staff are appropriately trained. This is kept up-to-date and retained by the DSL. The Single Centralised Register contains details of all employees who are employed or contracted to work at the company, detailing all full-time and part-time staff or contractors who have contact with children.
	Tutor In A Box ensures safe recruitment through the following processes: By providing the following safeguarding statement in recruitment adverts or application details – available at: https://www.tutorinabox.co.uk/safer-recruitment/
	Shortlisting is based on formal application processes/forms and not on provision of CVs. Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification and scenarios relating to Safeguarding responsibilities relevant to the role. DBS checks and barred list checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. Portable/ carry over DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts. No formal job offers are made until after checks for suitability are completed (including but not limited to DBS check, a barred list check and 2 references). This will be monitored and evaluated through a yearly Safer Recruitment Evaluation audit.
	Our staff (paid and unpaid) are subject to safeguarding checks including an enhanced DBS check. Staff DBS checks are renewed annually and our Safeguarding Leads attend a Designated Safeguarding Lead Training at least annually to ensure that our policies, procedures and staff knowledge stays up to date. We make sure that these adhere to the legislation and procedures in place for the protection of children in England.

The following information will be checked as part of the safer recruitment and is recorded on the SCR:
- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Details of two suitable references

Disclosure and Barring Service Gap Management
The organisation commits resources to providing Disclosure and barring service checks on staff (paid or unpaid) whose roles involve contact with children and /or vulnerable adults.

In order to avoid DBS gaps, the organisation will maintain and review a list of roles across the organisation which involves contact with children/ vulnerable adults.
In addition to checks on recruitment for roles involving contact with children/ vulnerable adults, for established staff the following processes are in place. A 3 year rolling programme of re-checking DBS's is in place for holders of all identified posts. Existing staff (paid or unpaid) who transfer from a role which does not require a DBS check to one which involves contact with children / vulnerable adults will be subject to a DBS check.

Service delivery contracting and sub-contracting
There will be systematic checking of safeguarding arrangements of partner organisations. Safeguarding will be a fixed agenda item on any partnership reporting meetings. Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non compliance procedures.

Training	Tutor In A Box provides training for all staff (paid and unpaid) into safeguarding. They receive initial training when they first join the company and then also throughout their contract and at least every year.
	Induction Training Will include Discussion of the Safeguarding Policy (and confirmation of understanding). Discussion of other relevant policies. Ensure familiarity with reporting processes, the roles of line manager and DSL (and who acts in their absence). Initial training on safeguarding including: safe working practices, safe recruitment, understanding child protection and the alerter guide for adult safeguarding .
	Ongoing Training All staff who, through their role, are in contact with children and / or vulnerable adults will have access to ongoing safeguarding training at an appropriate level. Sources and types of training will include: regular CPD training with the Safeguarding lead as well as annual safeguarding training (see below for previous particular training in CPD meetings). This includes but is not limited to topics such as signs and symptoms of abuse, prevent, online safety, FGM and others. Training is provided every year in a formal setting, with updates provided in CPD meetings throughout the year as and when appropriate.
	Training for children with a social worker: • Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children. • Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about: - Responding to unauthorised absence or missing education where there are known safeguarding risks. - The provision of pastoral and/or academic support
	Training for looked after and previously looked after children / Children In Care We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that: - Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements - The DSL has details of children's social workers and relevant virtual school head. We have appointed an appropriately trained teacher, Amandine Stone to take the lead on promoting the educational achievement of looked-after and previously looked-after children. As part of their role, they will:

	● Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to ● Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children **Communications and discussion of safeguarding issues** Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice: Team meetings, management meetings, one to one meetings (either informally or formally), board meetings and through supervision. **Support** We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include: ● Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with. ● Seeking further support as appropriate e.g. access to counselling. ● Staff who have initiated protection concerns will be contacted by DSL / Line manager within one week.
If a child makes a disclosure to you	If a child discloses a safeguarding issue to you, you should: ● Listen to and believe them. Allow them time to talk freely and do not ask leading questions. ● Stay calm and do not show that you are shocked or upset ● Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner. ● Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret. ● Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it ● Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. **See Appendix 2 for more detail.**

Phones and Social Media	Professional boundaries are what define the limits of a relationship between a support worker and a client. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place. Tutor In A Box expects staff to protect the professional integrity of themselves and the organisation. The following professional boundaries must be adhered to: Personal relationships between a member of staff (paid or unpaid) and a client who is a current service user is prohibited. This includes relationships through social networking site such as Facebook. It is also prohibited to enter into a personal relationship with a person who has been a service user over the past 12 months. In addition to the above expectations, employees and volunteers using personal social media accounts, websites, web forums or 'blogs' must: ● Refrain from identifying themselves as working for Tutor In A Box in a way which has, or may have, the effect of bringing the company into disrepute; ● Not identify other employees, volunteers or students; ● Not allow students or their parents/carers to access their personal social networking accounts; ● When they are contacted by a student or parent/ carer via a social media route, bring that to the attention of their line manager at the earliest opportunity Regarding the use of phones, all staff members must: ● Refrain from sharing a personal phone number with any students or parents/carers ● Only use personal phones outside of working hours The following policies also contain guidance on staff (paid or unpaid) conduct: ● Staff Behaviour Policy (including additional for tutors) If the professional boundaries and/or policies are breached this will result in disciplinary procedures or enactment of the allegation management procedures.

Reporting	The process outlined below details the stages involved in raising and reporting safeguarding concerns at Tutor In A Box .
	Communicate your concerns with the DSL – Amandine Stone. This will often be done by completing a Record of Concern (Green Form).The next steps may not follow the exact order below and will vary according to the advice or input from the DSL.
	DSL will discuss with parents / careers / guardian / school of child or with vulnerable person. Make referral as appropriate and obtain permission if safe and appropriate.
	The DSL will make the referral and speak to the Local Authority Safeguarding and use the Vulnerable Groups Incident Report Form if required and submit to the local authority within 24 hours of making a contact.
	The local contact for us is Warwickshire Multi-Agency Safeguarding Hub (MASH) is the local safeguarding team and can be reached by calling 01926 414144. Out of hours please contact the Emergency Duty Team immediately by calling 01926 886922.
	Ensure that feedback from the Local Authority is received and their response recorded
	If you think someone is at immediate risk of abuse or harm: · contact either the police on **999** or call Warwickshire Safeguarding (MASH) on **01926 414144 (Mon-Fri 8.30 - 5) or 01926 886922 if out of hours.** · Alternatively, call the NSPCC 24-hour safeguarding line on **0808 800 5000**
Allegations Management	Tutor In A Box recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation. The process for raising and dealing with allegations is as follows: Any member of staff (paid or unpaid) from Tutor In A Box is required to report any concerns in the first instance to the DSL (our deputy DSL if the concern regards the DSL) and then follow up with a written record (Yellow Form). A written record of the concern will be completed by the DSL (or deputy DSL). This will be followed by contacting the local authority for advice and following their process. Tutor In A Box recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), according to the ISA referral guidance document.

Monitoring	The organisation will monitor the following Safeguarding aspects: Safe recruitment practices, DBS checks undertaken, References applied for new staff, Records made and kept of supervision sessions, Training – register/ record of staff training on child/ vulnerable adult protection, Monitoring whether concerns are being reported and actioned, Checking that policies are up to date and relevant, Reviewing the current reporting procedure in place, and ensuring the presence and action of the Designated Safeguarding Lead responsible for Safeguarding is in post.
Managing Information	Information will be gathered, recorded and stored in accordance with the following policies: Data Protection Policy, Confidentiality Policy. All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Safeguarding Lead. All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.

Record Keeping	Tutor In A Box keeps a Single Central Record of checks in line with instructions contained in the DfE guidance. This is so that all information is easily accessible and to ensure that all staff are appropriately trained.
	A Single Central Record is kept to meet the requirements of the DBS and Safeguarding Policies, detailing all full-time and part-time staff with contracts, volunteers and trustees who have contact with children.
	Tutor In A Box will maintain safeguarding (including early help) and child protection records in accordance with the guidance document Child Protection Record Keeping Guidance.
	Tutor In A Box will: ● Keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately; ● Keep records in a meticulous chronological order, electronically; ● Ensure all records are kept secure and in locked locations; ● Ensure all safeguarding records are transferred - separately from the child's main student file - to the receiving school, college or other education establishment when a student moves. ● The DSL will do this as soon as possible, ensuring secure transit, and will ensure that confirmation of receipt of the records is obtained. ● The DSL will also consider whether it is appropriate to share any information with a child's receiving school/setting in advance of the child leaving so that the receiving school/setting is able to support the child as effectively as possible and plan for her/his arrival.
	Safeguarding and child protection records will be maintained independently from the student's main file and it will be 'tagged' to indicate that separate information is held. Such records will only be accessible to the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.
	The format for all staff to record any safeguarding or child protection observations or concerns about a child is the pro forma Logging A Concern About A Child's Safety and Welfare also known as the 'Green form'. The same format will be used by staff to record and report any observations or concerns that suggest a child might benefit from early help.
	Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern.
	Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record.

	Records of safeguarding/child protection observations or concerns will be completed electronically and all records will be passed to the Designated Safeguarding Lead, who will complete the form to confirm what action has been taken.
	Child protection records form a part of a child's student record, which parents ordinarily have a right to see. Any student or parent wishing to access the student's child protection records will need to submit a request to Tutor In A Box for consideration. Access to the record will then be arranged but records may be redacted in line with the requirements of the General Data Protection Regulation (GDPR) if releasing information would place the child, or any other person, at risk of significant harm.
	The Data Protection Act 2018 and GDPR do not prevent staff from sharing information with relevant agencies without the consent of parents, where that information may help to protect a child.

Confidentiality and Information Sharing	Tutor In A Box will manage and share confidential information about children in line with Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (HMG 2018) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf
	All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence. The Data Protection Act 2018 (DPA) and the GDPR places duties on the company and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, neither the DPA nor the GDPR prevent or limit the sharing of information for the purposes of keeping children safe. Keeping Children Safe in Education (DfE 2022) states clearly that *"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"*.
	Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL or outside agency as required (e.g. MASH Education Lead). It is reasonable for staff to discuss day-to-day concerns about students with colleagues in order to ensure that student's general needs are met. However, staff will report all child protection and safeguarding concerns to the DSL or – in the case of concerns about the DSL – to the deputy DSL. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.
	The GDPR and the Data Protection Act 2018 do not prevent staff from sharing information with relevant agencies, where that information may help to protect a child. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. The DSL will normally obtain consent from the student and/or parents to share sensitive information within Tutor In A Box or with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the DSL.
	Information sharing will take place in a timely and secure manner and where: it is necessary and proportionate to do so; and the information to be shared is relevant, adequate and accurate. Information sharing decisions will be recorded, whether or not the decision is taken to share.
	All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which require that sensitive information is: ● Processed for limited purposes ● Adequate, relevant and not excessive ● Accurate ● Kept no longer than necessary ● Processed in accordance with the data subject's rights

	● Secure. Record of concern forms (Green forms) and other written information will be stored electronically, password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a USB drive will be password protected or encrypted.

Online Safety	The advances in technologies mean that children are susceptible to a wider range of risks. These include but are not limited to three main risks areas; content, contact and conduct, some of which examples are listed below:
	● Exposure to inappropriate content (such as pornographic content or extremist material) ● Cyber bullying ● Online grooming ● Sharing humiliating videos or pictures ● Sexting (sending sexual images) ● Hazing videos / Inappropriate rituals ● Identity theft ● Copyright Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines. Tutor In A Box will request and obtain written consent from parents/carers including consent to record lessons and video conversations before staff communicate with children online. It is important that all staff who interact with children online continue to look out for signs that a child may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL. The DSL will respond to any such concern as they would any other safeguarding concern. Tutor In A Box will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements. Below are other issues that staff need to take into account when delivering online/virtual lessons or communicating with children online, particularly where webcams are used: ● Staff and children must be fully dressed and wear suitable clothing, as should anyone else in the household. ● Any computers used should be in appropriate areas, and the background should not contain any personal or inappropriate items and details. ● Language must be professional and appropriate, including that used by any family members in the background. ● Tutor In A Box will record the length, time, date and attendance of any sessions held. ● Staff members delivering lessons or communicating with children online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the child and/or parent immediately and will end the online interaction if necessary. Any such incident will be recorded and reported to the DSL.

| Child on Child Abuse | Tutor In A Box believes that all children have a right to earn in a safe environment. Children should be free from harm, both from adults and other students in our sessions. Children may be harmed by other children or young people.

All staff recognise that children can abuse their peers and are trained to record any concerns during group sessions or disclosures to the DSL. All child on child abuse is unacceptable and will be taken seriously.

It is most likely to include, but is not limited to:
● Bullying (including cyberbullying);
● Physical abuse such as 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, which may be stand-alone or part of a broader pattern of abuse;
● Sexting including pressuring another person to send a sexual image or video content (also known as youth produced sexual imagery);
● Upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim;
● Teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
● Initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
● Prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported to the DSL (where group sessions take place within a school, all concerns should be noted to the school DSL before leaving the premises). |

Prevent	
	The Prevent duty is section 26 of the CounterTerrorism and Security Act 2015 (the CTSA 2015), stating we should have 'due regard to the need to prevent people from being drawn into terrorism'. Some children are vulnerable to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of Tutor In A Box's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the Designated Safeguarding Lead is responsible for Tutor In A Box's strategy for protecting children from those risks.

Outlined below is information from the NSPCC about radicalisation and what you should do if you think a child is being radicalised.

How does radicalisation happen?

The process of radicalisation may involve:
- Being groomed online or in person
- Exploitation, including sexual exploitation
- Psychological manipulation
- Exposure to violent material and other inappropriate information
- The risk of physical harm or death through extremist acts.

It happens gradually so children and young people who are affected may not realise what it is that they are being drawn into.

Vulnerability factors

Anyone can be radicalised but there are some factors which may make a young person more vulnerable. These include:
- Being easily influenced or impressionable
- Having low self-esteem or being isolated
- Feeling that rejection, discrimination or injustice is taking place in society
- Experiencing community tension amongst different groups
- Being disrespectful or angry towards family and peers
- Having a strong need for acceptance or belonging
- Experiencing grief such as the loss of a loved one.

These factors will not always lead to radicalisation.

Indicators of radicalisation

If a child or young person is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause. For example, they may:
- Spend increasing amounts of time talking to people with extreme views (this includes online and offline communication) |

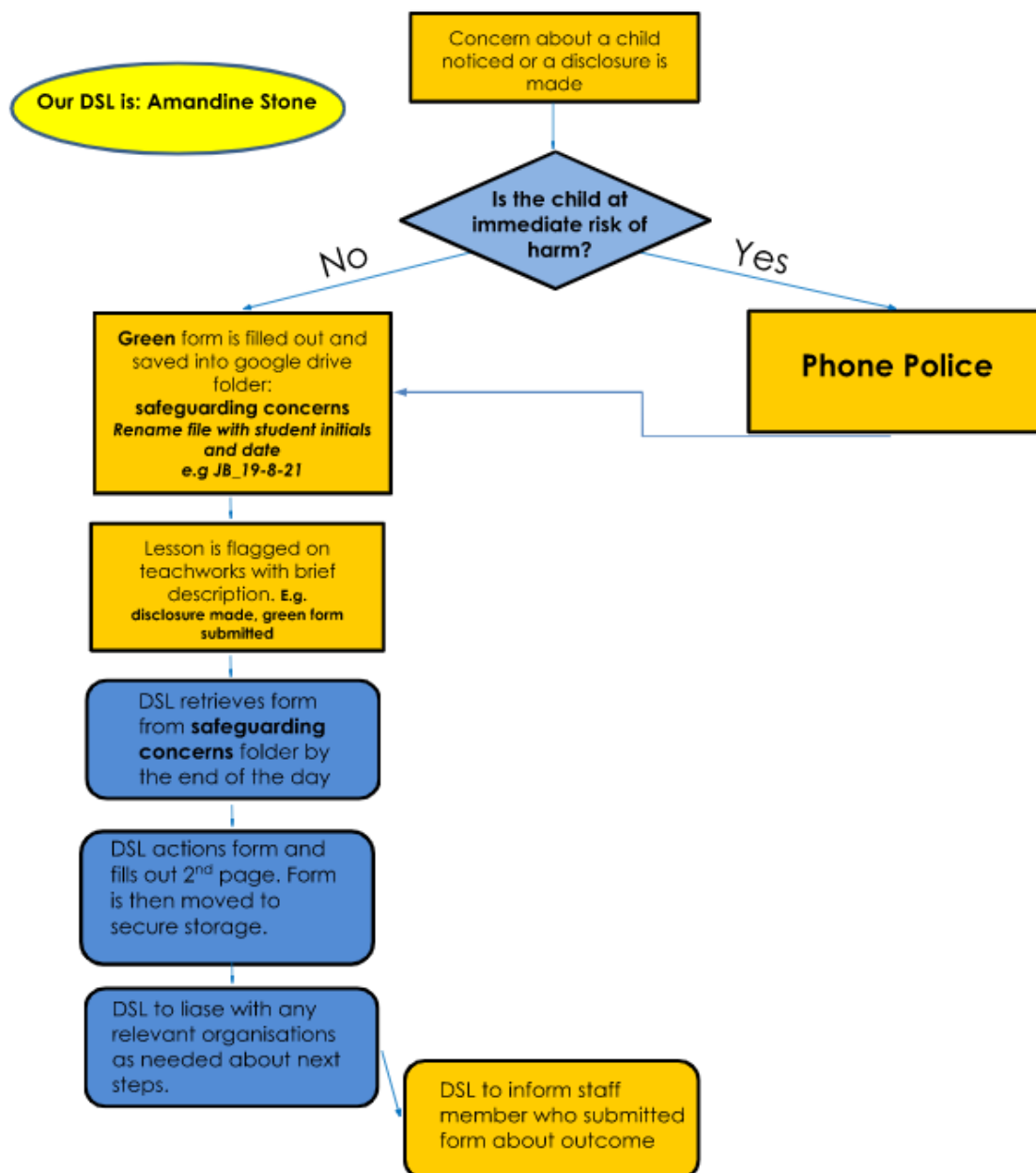|	
	- Change their style of dress or personal appearance - Lose interest in friends and activities that are not associated with the extremist ideology, group or cause - Have material or symbols associated with an extreme cause - Try to recruit others to join the cause **What to do if you think a child is being radicalised** If you think a child or the people around them are involved in radicalisation and there is an immediate risk of harm, call 999 straight away. If it isn't an emergency, you should follow the 'Report a concern' procedures as outlined in this policy, making sure you contact Amandine Stone (DSL).
Conflict resolution and complaints	Tutor In A Box is aware of the Complaints policy on resolution of professional disagreements in work relating to the safety of children / Escalation Policy and if necessary this will be taken forward by the Designated Safeguarding Lead which is Amandine Stone. Conflicts in respect of safety of vulnerable adults will be taken forward by the Designated Safeguarding Lead.

Submitting Child Protection Referrals	All child protection referrals should be made to the Multi-Agency Safeguarding Hub (MASH) by completing a Multi-Agency Referral Form (MARF) and submitting it to the MASH at **mash@warwickshire.gov.uk**. The form can also be completed online. All urgent child protection referrals, i.e. where there is an immediate concern about a child's safety, should be made in the first instance by telephoning the MASH on **01926 414144**. This should be followed by submission of a MARF as above. NB If a child is already the subject of an open case to Children's Social Care, the DSL will have the name and contact details of the allocated social worker. Further child protection concerns about any child in those circumstances must be referred directly to the allocated social worker, **not** to the MASH. Again, where there is an immediate concern about a child's safety, the DSL should contact the social worker by telephone in the first instance. Any difficulties in contacting the social worker must be escalated to their line manager, **not** to the MASH. Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team on telephone number **01926 886922.** If staff are ever concerned that a child is in immediate danger, they will contact the Police by dialling 999. Staff may seek support directly from the MASH Education Lead via **01926 414144** should they consider that necessary.
Staff reporting directly to child protection agencies	Staff should ordinarily follow the reporting procedures outlined in this policy. However, as highlighted above, all staff should be aware of the early help process and understand their role in it; and all staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989. Any member of staff may therefore refer their concerns directly to Children's Social Care and/or the Police if: ● The situation is an emergency and the DSL and the deputy DSL are both unavailable; ● They are convinced that a direct report is the only way to ensure the child's safety; ● Or for any other reason they make a judgement that a direct referral is in the best interests of the child. In any of those circumstances, staff may make direct child protection referrals and share information without being subject to censure or disciplinary action. However, staff should inform the DSL at the earliest opportunity that they have made a direct referral unless in their judgement doing so would increase the risk of harm to the child. If in any doubt, members of staff may consult the MASH (details above) or seek support from the MASH Education Lead via 01926 414144.
Communicating and reviewing the policy	Tutor In A Box will make clients aware of the Safeguarding Policy through the following means: by displaying it on our website. This policy will be reviewed by the DSL every year and when there are changes in legislation.

Appendix 1
Safeguarding Procedure

Our DSL is: Amandine Stone

Concern about a child noticed or a disclosure is made

Is the child at immediate risk of harm?

No

Yes

Green form is filled out and saved into google drive folder:
safeguarding concerns
Rename file with student initials and date
e.g JB_19-8-21

Phone Police

Lesson is flagged on teachworks with brief description. **E.g.** disclosure made, green form submitted

DSL retrieves form from **safeguarding concerns** folder by the end of the day

DSL actions form and fills out 2nd page. Form is then moved to secure storage.

DSL to liase with any relevant organisations as needed about next steps.

DSL to inform staff member who submitted form about outcome

Appendix 2
If a child shares a concern

1. **Listen carefully to what they're saying**
   Be patient and focus on what you're being told. Try not to express your own views and feelings. If you appear shocked or as if you don't believe them it could make them stop talking and take back what they've said.

2. **Let them know they've done the right thing by telling you**
   Reassurance can make a big impact. If they've kept the abuse a secret it can have a big impact knowing they've shared what's happened.

3. **Tell them it's not their fault**
   Abuse is never a child's fault. It's important they hear, and know, this.

4. **Say you'll take them seriously**
   They may have kept the abuse secret because they were scared they wouldn't be believed. Make sure they know they can trust you and you'll listen and support them.

5. **Don't confront the alleged abuser**
   Confronting the alleged abuser could make the situation worse for the child.

6. **Explain what you'll do next**
   For younger children, explain you're going to speak to someone who will be able to help. For older children, explain you'll need to report the abuse to someone who can help.

7. **Report what the child has told you as soon as possible**
   Report as soon after you've been told about the abuse so the details are fresh in your mind and action can be taken quickly. It can be helpful to take notes straight after you've spoken to the child. Try to keep these as accurate as possible.

Our role is to recognise and refer not investigate.

This is to avoid contamination of evidence gained in any subsequent investigation undertaken by Police &/or Social Services and to ensure that the child is not placed in the stressful position of having to repeat their story over and over again. 'Not investigating' does not mean that the staff member receiving the concern cannot ask any questions. However, careful thought needs to be given to how and what questions are asked, avoiding anything that can be interpreted as 'leading' the child. **The basic rule of thumb is that staff should ONLY ask enough questions of the child to clarify whether there is a child protection concern.** Once the child has clarified that they are being harmed or are at risk (or the staff member is reassured that the child is safe), no further questions are required.

Things to say or do:
- 'What you are telling me is very important'
- This is not your fault
- 'I am sorry that this has happened/is happening'
- 'You were right to tell someone'
- What you are telling me should not be happening to you and I will find out the best way to help you'
- Make notes soon after the event. Try to write down exactly what the young person or child said. Avoid assumptions or conjecture.

Questions you can ask to clarify details (open):
Who/What/Where/How
Who was there? (avoid 'who did this to you?')
Where were you?
How did it happen?
What happened?
How does it make you feel?
How often does it happen?

Things not to say or do:
- Do not ask leading questions – see below for examples
- Avoid asking questions that start with why - these can cause the child to feel at fault
- Do not say 'Are you sure?'
- Do not show your own emotions e.g. shock/disbelief
- Do not make false promises

What you should not do
1. Project workers/volunteers should not begin investigating the matter themselves.
2. Do not discuss the matter with anyone except the correct people in authority.
3. Do not form your own opinions and decide to do nothing.

Leading Questions
Avoid any leading questions (questions that start with the below)

Isn't it true….
Isn't it a fact….
Won't you admit….
Won't you concede….
Wouldn't you agree….

Wouldn't you have to say…

Don't...
Didn't...
Isn't...
Aren't...
Wasn't...
Weren't...

Do...
Did...
Is...
Are...
Was...
Were…

Examples:
Did [name] do this to you?
Is that where you got the bruise from?
Was anyone else there? (instead ask - who else was there?)

Appendix 3
Key Contacts

Designated Safeguarding Lead (DSL) - Amandine Stone
Contact: amandine@tutorinabox.co.uk , 07462 059 870

Deputy Designated Safeguarding Lead - Sophie Parker
Contact: sophie@tutorinabox.co.uk

Police (In an emergency) - 999

Warwickshire Safeguarding MASH
mash@warwickshire.gov.uk.
01926 414144
Emergency Duty Team (Out of Hours) 01926 886922.

NSPCC
0808 800 5000

Education Support – available to all contractors and employees of Tutor In A Box
08000 562 561