



Safeguarding and Child Protection Policy

Secondary Alternative Education Provision

Policy owner	In-Tuition Learning
Designated Safeguarding Lead	John Burchall
Effective date	August 2026
Review date	August 2027

Key safeguarding contacts

Role / service	Name or contact	Details
Designated Safeguarding Lead (DSL)	John Burchall	Internal contact details to be displayed at all sites
Children and Families, Contact Swindon	01793 464646	contactchildrenandfamilies@swindon.gov.uk
Emergency Duty Service	01793 445500, option 4	Outside normal office hours
Local Authority Designated Officer (LADO)	01793 463854	LADO@swindon.gov.uk
Police	999 / 101	999 where there is immediate danger or a crime in progress
NSPCC whistleblowing advice line	0800 028 0285	For concerns about how child protection issues are being handled

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1. Policy statement and safeguarding principles

In-Tuition Learning is committed to safeguarding and promoting the welfare of every learner who attends, visits or is connected with the provision. Safeguarding is integral to education, attendance, behaviour, pastoral care, curriculum planning, recruitment, information sharing and partnership work.

In-Tuition Learning may educate children and young adults. The welfare and safety of every learner is central to our practice. All staff must maintain an attitude of “it could happen here” and act immediately whenever they have a safeguarding concern.

In-Tuition Learning will:

- provide a safe, respectful and inclusive learning environment in which students are listened to and taken seriously;
- identify concerns early and provide or seek help before difficulties escalate;
- respond promptly to suspected abuse, neglect, exploitation or harm;
- work in partnership with parents, carers, placing schools, local authorities, health, police and children’s social care;
- maintain effective safeguarding records and share information lawfully and proportionately;
- ensure that staff are suitable, trained, supervised and clear about professional boundaries;
- recognise that safeguarding risks can arise inside and outside the home, online, in the community and between children; and
- promote equality and challenge racism, discrimination, harassment and harmful attitudes.

2. Scope and definitions

This policy applies to all employees, tutors, leaders, agency staff, volunteers, contractors, work-experience personnel, visitors and any other adult working for or on behalf of In-Tuition Learning. It applies during on-site teaching, off-site activities, transport arranged by the provision, remote learning, work experience, educational visits and communication through digital platforms.

Safeguarding and promoting the welfare of children means:

- providing help and support to meet children’s needs as soon as problems emerge;
- protecting children from maltreatment, whether inside or outside the home, including online;
- preventing impairment of children’s mental and physical health or development;
- ensuring children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

2.1 Age range and application of this policy

In-Tuition Learning may provide education to learners of secondary-school age and young adults up to the age of 25.

For safeguarding purposes, a child is anyone who has not yet reached their 18th birthday. The child-protection procedures in this policy apply to all learners under 18.

Learners aged 18 or over are adults in law. Concerns about an adult learner will be managed under appropriate adult-safeguarding arrangements, including the Care Act 2014 and local Safeguarding Adults procedures where the relevant criteria are met.

In-Tuition Learning will respond to concerns about any learner, regardless of age. Staff must report all safeguarding concerns immediately to the Designated Safeguarding Lead, who will determine the appropriate referral pathway. Where there is immediate danger or a suspected crime, staff must contact the emergency services without delay.

3. Alternative provision context and additional vulnerability

In-Tuition Learning provides alternative education for secondary-age students. Many students may have experienced exclusion, disrupted education, poor attendance, trauma, social care involvement, unmet special educational needs, anxiety, mental ill health, family stress, exploitation or difficulties trusting professionals. These factors do not mean that harm has occurred, but they can increase vulnerability and make signs of abuse harder to identify.

Staff must avoid describing safeguarding indicators solely as “behaviour”. Changes in attendance, engagement, presentation, language, peer group, online activity, emotional regulation, physical appearance or willingness to go home may be communication of unmet need or harm.

3.1 Child voice and the safeguarding curriculum

Safeguarding includes prevention as well as response. Students will be helped to understand healthy relationships, consent, personal boundaries, online safety, image sharing, grooming, exploitation, coercive control, discrimination, substance-related risk, help-seeking and how to identify trusted adults. Learning will be age-appropriate, inclusive, responsive to the cohort and adapted for SEND, communication and trauma-related needs.

When a concern is managed, staff will seek and record the child’s wishes and feelings, explain what will happen in language the child understands, offer communication support or a trusted adult where appropriate, and avoid requiring the child to repeat an account unnecessarily. The child’s wishes will inform decisions but will not prevent protective action.

- students will be told how to raise a concern privately and how to contact external support;
- staff will check that students know who the DSL is and how to obtain help when learning remotely or off-site;
- student feedback, complaints, attendance and incident patterns will be used to test the safeguarding culture; and
- racism, sexism, homophobia, transphobia, disability discrimination and adultification will be challenged and considered as potential safeguarding concerns.

AP safeguarding expectation

Staff must use professional curiosity, consider the student’s lived experience and avoid assuming that a known diagnosis, behaviour plan or previous history explains away a new concern.

4. Roles and responsibilities

4.1 The proprietor / senior leadership

- ensures that safeguarding arrangements comply with statutory guidance and local procedures;
- appoints an appropriately trained DSL with sufficient authority, time, resources and cover;
- ensures safeguarding is considered when commissioning services, arranging premises, transport, technology and off-site provision;
- ensures safer recruitment, the single central record and ongoing suitability checks are effective;
- reviews safeguarding performance, allegations, low-level concerns, training, referrals, attendance and filtering and monitoring at least annually; and
- ensures the policy is available to staff, parents, carers, placing schools and commissioners.

4.2 The Designated Safeguarding Lead

- acts as the main point of contact for safeguarding concerns;
- provides advice and support to staff and makes or oversees referrals;
- maintains secure, accurate and timely safeguarding records and chronologies;
- liaises with children's social care, police, health, placing schools and local authority services;
- attends or contributes to child protection conferences, core groups, strategy discussions and multi-agency meetings;
- supports students who are subject to child protection, child in need, early help or care plans;
- leads on online safety, filtering and monitoring, Prevent and safeguarding training;
- ensures safeguarding information transfers securely when a student joins or leaves;
- keeps the proprietor informed of safeguarding themes without breaching unnecessary confidentiality; and
- ensures adequate DSL cover whenever students are present.

4.3 Safeguarding cover, independence and conflicts of interest

The DSL is John Burchall. A current written safeguarding-cover arrangement must be displayed at every teaching location and included in staff induction. It must identify the safeguarding-trained person or direct-referral route to be used whenever the DSL is unavailable. A referral must never be postponed because a particular manager cannot be contacted.

Where the DSL is also the proprietor, any allegation, low-level concern, complaint or conflict involving that person must be reported directly to the Swindon LADO where the harm threshold may be met, or to children's social care or police where a child may be at immediate risk. The person who is the subject of a concern must not control the initial safeguarding decision, evidence gathering or communication with the child.

The proprietor will arrange periodic independent safeguarding scrutiny by a suitably experienced person who is not the DSL. This will include review of anonymised records, referral quality, training, allegations, low-level concerns, recruitment, attendance, online safety and actions arising from audits.

4.4 All staff

- read and understand the required part of current KCSIE and this policy;
- complete safeguarding induction and updates;
- know the identity and contact arrangements of the DSL and the safeguarding-trained person providing cover when the DSL is unavailable;
- recognise indicators of abuse, neglect, exploitation and mental health need;
- report concerns immediately and record them accurately;
- never investigate, promise secrecy or delay action while seeking proof;
- challenge unsafe practice and report concerns about adults; and
- maintain professional boundaries and follow the staff code of conduct.

5. Safer culture and professional conduct

A safer culture is created through clear expectations, open reporting, respectful relationships, appropriate supervision and consistent response to concerns. Staff must model safe behaviour and avoid conduct that could be misinterpreted or place a student or adult at risk.

- one-to-one work must be planned, visible or otherwise appropriately monitored;
- physical contact must be necessary, proportionate and in the student's interests;
- personal mobile phones and personal accounts must not be used to photograph, film or privately communicate with students;
- staff must not establish secret, sexualised, exploitative or over-dependent relationships;
- gifts, transport, social contact and contact outside agreed channels must follow organisational procedures;
- staff must report any situation in which they believe their own conduct may have been misunderstood; and
- whistleblowers will be supported and concerns will be handled without victimisation.

5.1 One-to-one tuition

- one-to-one sessions must be timetabled, take place in an agreed room or platform, and be known to a manager or responsible adult;
- rooms should have vision panels, open-door arrangements or another proportionate means of visibility; where this is not possible, a documented risk assessment and check-in arrangement is required;
- staff must not move a session to an unapproved venue, give private lifts, arrange social contact or communicate through personal accounts;
- arrival, departure, collection, late collection, breaks and toilet arrangements must be clear;
- any change in venue, adult, timing or transport must be authorised and communicated to the parent or carer and commissioner as appropriate; and
- a disclosure or concerning incident during one-to-one work must be reported immediately and must not be managed privately by the tutor.

5.2 Remote tuition and digital communication

- approved organisational accounts and platforms must be used; personal social-media accounts and disappearing-message services are prohibited;
- the learner's current location, emergency contact and means of contacting a parent or carer must be known at the start of remote delivery;
- staff must use a suitable professional background and must not record a session unless this has been specifically authorised, risk assessed and communicated;
- private chat, file sharing and screen sharing must be limited to legitimate educational purposes and retained where the platform permits;
- if a learner appears unsafe, discloses harm, becomes unreachable or leaves unexpectedly, the tutor must contact the DSL and follow the emergency or welfare-check procedure;
- remote sessions must end if an unknown adult behaves inappropriately, privacy cannot be maintained or the environment presents an immediate safeguarding concern; and
- staff must report accidental exposure to indecent, abusive or illegal material and must not copy, forward or retain it except as directed by police or the DSL.

5.3 Lone working and home or community tuition

Lone working with a child requires a written risk assessment covering location, access and exit, known risks, communication, check-in and check-out, emergency action, personal safety and arrangements for any other people present. Home or community tuition must be authorised in advance. Staff must not enter an unsafe environment, remain where violence, intoxication, weapons or uncontrolled animals create risk, or undertake intimate or personal care unless specifically trained and authorised.

6. Recognising abuse, neglect and exploitation

Abuse may be a single incident or a pattern. It may occur in a family, institution, peer group, community or online. Children may be harmed by adults or other children. A child may not recognise their experience as abuse or may communicate indirectly.

6.1 Main categories of abuse

Physical abuse: Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, fabricated or induced illness, or otherwise causing physical harm.

Emotional abuse: Persistent emotional maltreatment, including humiliation, intimidation, rejection, coercive control, exposure to domestic abuse, serious bullying or preventing normal social interaction.

Sexual abuse: Forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening, including contact and non-contact acts, online abuse and exploitation.

Neglect: Persistent failure to meet a child's basic physical or psychological needs, including food, clothing, shelter, supervision, medical care, education, emotional care or protection from danger.

6.2 Indicators requiring professional curiosity

- unexplained injuries, repeated accidents or inconsistent explanations;
- significant change in mood, behaviour, attendance, achievement, appearance or peer group;
- fear of a person, place, journey or returning home;
- sexualised behaviour or knowledge inappropriate to age or development;
- hunger, poor hygiene, unsuitable clothing, untreated medical needs or persistent tiredness;
- self-harm, suicidal thoughts, substance misuse or risk-taking;
- unexplained money, gifts, devices, hotel or taxi use, multiple phones, new older associates or going missing;
- frequent absence, late collection, unexplained travel or being found far from home;
- online secrecy, threats, blackmail, image sharing or sudden deletion of accounts; and
- a child's direct or indirect disclosure.

6.3 Additional safeguarding issues

The following issues may arise alone or in combination. Staff are not expected to diagnose or prove harm; they must report indicators and use professional curiosity.

- children missing from home or care, repeated missing episodes and unexplained travel;
- trafficking, modern slavery, forced criminality and financial exploitation;
- private fostering, homelessness, sofa surfing and insecure accommodation;
- fabricated or induced illness and perplexing presentations;
- abuse linked to faith, belief, witchcraft or spirit possession;
- substance misuse, exploitation through debt and unsafe adults or premises;
- young carers, parental ill health, parental imprisonment and children affected by offending in the family;
- discriminatory abuse, hate incidents, adultification and identity-based targeting;
- abuse in intimate relationships between children and harmful sexual behaviour;
- sharing nude or semi-nude images, including coercion, threats, extortion and AI-generated or altered sexual imagery;
- cybercrime, online fraud, gambling, scams and recruitment into harmful online communities; and
- any pattern of injury, absence, behaviour, peer association or family circumstance that does not have a credible explanation.

A young person aged 16 or 17 remains a child for safeguarding purposes. Their consent and wishes will be considered carefully, but consent is not required where sharing information is necessary to protect them or another person from harm.

7. Responding to a concern or disclosure

Immediate rule

Report the concern to the DSL immediately. If a child is in immediate danger, call 999 and then inform the DSL as soon as possible.

7.1 When a child speaks to you

- listen carefully and allow the child to speak at their own pace;
- remain calm and take the child seriously;
- use open prompts only, such as “Tell me what happened”;
- do not ask leading, multiple or investigative questions;
- do not promise confidentiality; explain that information must be shared with people who can help;
- reassure the child that they have done the right thing and are not to blame;
- do not confront the alleged perpetrator;
- make a factual record as soon as possible, including the child’s exact words where possible; and
- report immediately to the DSL, even where the child asks you not to.

7.2 Recording a concern

The record must include the date, time, location, people present, nature of the concern, observations, injuries or behaviour, the child’s exact words, actions taken, who was informed and when. Opinion must be clearly distinguished from fact. Records must be signed or attributable to the author and stored in the safeguarding system, not in general teaching notes.

7.3 If the DSL is unavailable

Staff must use the published safeguarding cover arrangements or report to the nominated senior person. Lack of DSL availability must never delay action. Any staff member may contact children’s social care or the police directly and must then inform the DSL as soon as practicable.

8. Referrals, early help and escalation

8.1 Early help

Where needs are emerging but the threshold for statutory intervention may not be met, the DSL will consider early help with the child, family, placing school and relevant agencies. Early help must not be used where there is reasonable cause to suspect significant harm.

8.2 Referral to children’s social care

- A referral will be made immediately where a child has suffered or is likely to suffer significant harm.
- Parental consent is not required for a child protection referral, although parents will usually be informed unless this could increase risk, lead to evidence being destroyed or obstruct an investigation.
- The referrer will provide clear information about risk, protective factors, the child’s wishes and any known history.
- Urgent telephone referrals will be followed by the required written referral within local timescales.
- The DSL will follow up if no acknowledgement or decision is received.

8.3 Escalation

Where In-Tuition Learning disagrees with a decision or believes a child remains unsafe, the DSL will use the Swindon Safeguarding Partnership resolution and escalation process. Professional disagreement must not result in inaction.

8.4 Swindon referral and threshold pathway

The DSL will use the current Swindon Safeguarding Partnership Right Help at the Right Time guidance to consider the level of need. The guidance supports professional judgement and must not be used as a reason to delay action where significant harm is suspected.

1. Immediate danger or a crime in progress: call 999.
2. Child protection or welfare concern during office hours: contact Children and Families, Contact Swindon on 01793 464646 and, for professional referrals, complete the current Request for Help and Support / RF1 form as directed.
3. Urgent safeguarding concern outside office hours: contact the Emergency Duty Service on 01793 445500, option 4. Police 101 may also be used for a non-emergency crime concern.
4. Record the advice received, the name or role of the person spoken to, time, decision, referral reference and required follow-up.
5. Where the response does not protect the child, use the Swindon Safeguarding Partnership Adult and Children Resolution Policy and continue to escalate while maintaining immediate safety.

Where a child is resident or placed by another local authority, the DSL will clarify which authority should receive the referral. Uncertainty about cross-border responsibility must not delay an urgent referral.

9. Child-on-child abuse

All child-on-child abuse is unacceptable and will not be dismissed as banter, part of growing up or an inevitable feature of an alternative provision. It may occur on-site, off-site, during transport, online or between students who do not attend the same placement.

- bullying, including cyberbullying and prejudice-based bullying;
- physical abuse;
- sexual violence and sexual harassment;
- upskirting, image-based abuse and consensual or non-consensual sharing of sexual images;
- initiation or hazing;
- abuse in intimate relationships between children;
- coercion, exploitation, blackmail or threats; and
- group-based, discriminatory or identity-based harm.

The response will be child-centred and risk-led. The DSL will consider the safety and needs of the victim, alleged perpetrator and other children; separation and supervision arrangements; referral to social care or police; educational and pastoral support; and whether the incident indicates wider cultural or contextual risk.

10. Sexual violence and sexual harassment

Reports of sexual violence or sexual harassment will be taken seriously, recorded and responded to immediately. Staff must not mediate, force an apology, require the victim to repeat an account unnecessarily or promise a particular outcome.

- consider immediate medical, forensic and police needs;
- preserve evidence where appropriate and avoid viewing or forwarding illegal images;
- complete a written risk and needs assessment;
- consider timetable, transport, seating, online and contact arrangements;
- ensure the victim is not made to feel responsible for avoiding the alleged perpetrator;
- provide proportionate support to the alleged perpetrator without compromising the victim's safety; and
- review the response as circumstances change.

11. Online safety, filtering and monitoring

Online safety is part of safeguarding, not a separate technical issue. The provision will address content, contact, conduct and commerce risks, including grooming, coercion, extremist material, pornography, harmful challenges, scams, cyberbullying, image sharing and misuse of generative artificial intelligence.

11.1 Organisational controls

- assign clear responsibility for filtering and monitoring;
- use age-appropriate filtering and monitoring that reflects the risk profile of students and devices;
- review filtering and monitoring at least annually and following significant incidents or technology change;
- ensure alerts are reviewed promptly by appropriately trained staff;
- record decisions and actions arising from monitoring incidents;
- apply safe-search and appropriate controls to provision-managed devices;
- set clear rules for personal devices, mobile phones, remote learning and bring-your-own-device arrangements; and
- ensure staff understand that filtering does not replace active supervision and education.

11.2 Artificial intelligence

Use of generative AI must be risk assessed. Staff and students must not enter confidential, personal or safeguarding information into unapproved AI tools. AI-generated sexual, abusive, discriminatory or impersonation content will be treated as a safeguarding and conduct concern. Monitoring arrangements must consider tools that can bypass or weaken existing filters.

11.3 Operational filtering and monitoring arrangements

- the proprietor has strategic responsibility and must receive assurance that arrangements are suitable;
- the DSL leads the safeguarding response to alerts and works with the person or supplier responsible for IT;

- the annual review must consider learner age, SEND, language, known risk, remote use, personal devices, guest access, AI tools and any technology that may bypass controls;
- filtering must apply to provision-managed devices and internet access, including devices taken off-site; personal or guest devices must use an appropriately separated and controlled network or must not access the provision network;
- checks must be completed and logged at a frequency determined by risk, and whenever a new device, account, platform or site is introduced;
- monitoring alerts must be triaged promptly by trained staff, with urgent safeguarding alerts reviewed the same day and immediate-risk alerts acted on without delay;
- the record must show the alert, context, reviewer, decision, safeguarding action, referral and outcome;
- staff must report any failure, gap, unexpected access or suspected circumvention immediately; and
- no technical system replaces supervision, staff vigilance, curriculum education or direct reporting by students.

The annual review and routine check log will be available for safeguarding audit and commissioning assurance. Any decision not to block or monitor a known risk must be documented with compensating controls.

12. Attendance, absence and children missing education

Poor or changing attendance may indicate abuse, neglect, exploitation, mental ill health, family difficulty or unmet need. Attendance concerns must be considered through a safeguarding lens, particularly where a student is already vulnerable.

- record attendance accurately for every session;
- follow up unexplained absence promptly using agreed contacts;
- inform the placing school and commissioner in accordance with placement agreements;
- escalate where contact cannot be established or patterns cause concern;
- consider risks linked to transport, missing episodes, county lines, domestic abuse and online contact;
- ensure reduced timetables are time-limited, reviewed and agreed with responsible agencies; and
- share safeguarding information promptly when a student leaves, moves or stops attending.

12.1 Unexplained absence and a child who cannot be located

For every session, attendance must be recorded at the point of arrival or online engagement.

Unexplained absence must be followed up promptly using the agreed contact sequence. The placing school or commissioner must be informed within the timescale in the placement agreement and immediately where risk is elevated.

- staff must not assume that the parent, school, transport provider or commissioner has completed the welfare check; responsibility must be confirmed;
- where contact cannot be established, the DSL will consider known vulnerability, recent incidents, missing history, exploitation, domestic abuse, mental health, transport and the child's last known location;

- police and children's social care will be contacted where the child may be missing, at immediate risk or unable to be located safely; and
- all calls, messages, decisions, times and outcomes must be recorded.

13. Mental health, self-harm and suicide concerns

Mental health difficulties may be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Staff are not expected to diagnose, but must report concerning changes and respond to immediate risk.

- take all statements about self-harm or suicide seriously;
- remain with the child where there is immediate risk and seek emergency help;
- remove access to obvious means of harm where safe to do so;
- inform the DSL and parent or carer unless doing so would increase risk;
- seek specialist advice or referral through health, social care or emergency services; and
- develop and review a safety plan where appropriate.

14. Exploitation, serious violence and contextual safeguarding

Staff must consider risks beyond the family home, including peer groups, neighbourhoods, transport routes, parks, shops, hotels, takeaways, online spaces and organised criminal networks.

14.1 Child criminal exploitation and county lines

- going missing or being found outside the local area;
- unexplained money, clothing, phones, travel, taxis or hotel use;
- relationships with older or controlling individuals;
- carrying weapons, drugs or unexplained packages;
- fear, secrecy, injuries, debt, threats or sudden offending; and
- exploitation through "debts", status, affection, coercion or violence.

14.2 Child sexual exploitation

Child sexual exploitation is sexual abuse involving an exchange, perceived benefit, power imbalance or coercion. A child may believe a relationship is consensual and may not recognise exploitation. Seeming compliance does not remove safeguarding responsibility.

14.3 Serious violence

Indicators may include increased absence, decline in performance, self-harm, change in friendships, unexplained injuries, possession of weapons or association with gangs. The DSL will assess immediate safety, police involvement, social care referral, transport and peer risks.

15. Prevent duty and radicalisation

Radicalisation is a safeguarding concern. Staff must report concerns about a child being drawn into terrorism or supporting extremist violence. Concerns may arise through online activity, changes in language or associations, fixation on grievance, dehumanising views, secrecy or attempts to access or share terrorist material.

- the DSL will assess concerns using the same safeguarding principles as other risks;
- urgent risks or suspected offences will be referred to police;
- where appropriate, the DSL will seek advice or make a Prevent referral;
- the provision will maintain an appropriate Prevent risk assessment; and
- curriculum and pastoral work will support critical thinking, respectful debate, digital literacy and resilience to manipulation.

16. Domestic abuse, honour-based abuse, forced marriage and FGM

16.1 Domestic abuse

Children can be victims of domestic abuse in their own right. Abuse may be physical, emotional, sexual, economic or controlling and coercive. Living with domestic abuse can affect safety, attendance, behaviour, health and development. Staff will report concerns and respond to police or Operation Encompass information where applicable.

16.2 Honour-based abuse and forced marriage

Staff must report concerns about threats, surveillance, family control, withdrawal from education, travel plans, pressure to marry or punishment said to protect family “honour”. Staff must not approach family members or attempt mediation where this could increase risk.

16.3 Female genital mutilation

All concerns about FGM must be reported to the DSL. Teachers are subject to the mandatory reporting duty where, in the course of their professional work, they discover that FGM appears to have been carried out on a girl under 18. The DSL will support staff to fulfil any legal duty without delay.

17. Students with SEND, communication needs and disabilities

Children with SEND or disabilities may face additional safeguarding barriers. Signs of harm may be attributed to a condition; communication may be limited; intimate care or dependency may increase vulnerability; and children may experience disproportionate bullying or isolation.

- use the student’s preferred and accessible communication method;
- seek specialist communication support where required;
- do not assume a student cannot give a reliable account;
- consider sensory, cognitive, language and trauma needs when asking open questions;
- ensure behaviour plans do not obscure safeguarding concerns; and
- make reasonable adjustments so the student can participate in safeguarding decisions.

18. Looked-after and previously looked-after children

The DSL will maintain appropriate information about a looked-after child’s legal status, care arrangements, social worker, virtual school contact and delegated authority. Staff will recognise the potential impact of placement instability, trauma, missing episodes, exploitation and disrupted

education. Safeguarding information will be shared promptly with the placing authority and relevant professionals.

19. Allegations and concerns about adults

19.1 Allegations that may meet the harm threshold

An allegation may meet the harm threshold where an adult who works with children has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Concerns must be reported immediately to the proprietor or designated senior manager. The LADO must be consulted within one working day where the threshold may be met and before any internal investigation. Suspension is not automatic and will be considered as a neutral protective measure alongside alternatives.

19.2 Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted inconsistently with the staff code of conduct, including conduct outside work, even where it does not meet the harm threshold. Examples include over-familiarity, humiliating students, one-to-one contact contrary to procedure, inappropriate messaging, favouritism or boundary violations.

- all low-level concerns must be reported promptly;
- self-referral is encouraged where an adult recognises their conduct may be questioned;
- records will identify patterns, repeated concerns or wider cultural issues;
- the adult will be treated fairly and proportionately; and
- where the harm threshold may be met, the matter will be referred to the LADO without delay.

19.3 Concerns about the proprietor or DSL

Where the concern is about the proprietor, it must be reported directly to the LADO. Where the concern is about the DSL, it must be reported to the proprietor or another designated senior manager. A person who feels unable to raise a concern internally may contact the LADO, children's social care, police or the NSPCC whistleblowing advice line.

19.4 Support during and after safeguarding processes

The welfare of the child remains the priority throughout any referral, allegation, investigation or disciplinary process. A named trusted adult will be identified where appropriate. The provision will consider safety planning, timetable or transport changes, contact restrictions, emotional and communication support, medical help, advocacy and liaison with the placing school and family.

The child will not be required to manage risk by avoiding the adult or other child who is the subject of the concern. Support will continue after an investigation closes and will be reviewed for retaliation, bullying, online contact, attendance deterioration or renewed disclosure.

An adult who is the subject of an allegation will be treated fairly, given an appropriate contact for welfare and employment communication, and reminded not to contact the child or witnesses outside agreed arrangements. Support for the adult must never compromise the child's safety or the integrity of an external investigation.

20. Safer recruitment and suitability

Recruitment and ongoing employment procedures will deter, identify and reject people who are unsuitable to work with children. Recruitment records will be maintained in the single central record where applicable.

- clear safeguarding statements in advertisements and application materials;
- scrutiny of employment history and reasons for gaps;
- identity, right-to-work, qualification and reference checks;
- enhanced DBS and barred list checks where required;
- online searches on shortlisted candidates where appropriate and lawful;
- prohibition, direction and disqualification checks where applicable;
- risk assessments for any person beginning before all checks are complete;
- induction, probation and supervision;
- ongoing duty to disclose relevant changes in circumstances; and
- referral to the DBS and/or Teaching Regulation Agency where legal criteria are met.

20.1 Recruitment procedure and checks

- job advertisements and information packs will state the organisation's commitment to safeguarding and that suitability checks will be undertaken;
- a complete application form is required; a curriculum vitae may support but will not replace it;
- shortlisting will examine employment history, discrepancies, repeated changes, reasons for leaving and unexplained gaps;
- references will be obtained directly from appropriate referees, verified, compared with the application and followed up where vague, inconsistent or incomplete; open references will not normally be accepted;
- identity, right to work, qualifications and professional status will be checked before appointment;
- the correct level of enhanced DBS and children's barred-list check will be completed where the role is regulated activity;
- prohibition from teaching, section 128, disqualification, overseas and other checks will be completed where relevant to the role and legal status of the provision;
- online searches may be carried out on shortlisted candidates to identify publicly available safeguarding or reputational concerns; findings will be considered fairly and discussed at interview where relevant;
- agency, contractor and transport-provider assurances will be obtained in writing and identity will be checked on arrival;
- volunteers, self-employed tutors and people delivering work experience will be assessed according to their duties, supervision and regulated-activity status;

- no person will begin unsupervised work before required checks are complete. Any exceptional start before completion requires a written, time-limited risk assessment, verified identity, appropriate DBS status and continuous supervision;
- checks will be recorded in the organisation's central recruitment record, with dates, checker and outcome; and
- ongoing suitability will be supported through induction, probation, supervision, conduct expectations, low-level-concern reporting and a duty to disclose relevant changes.

20.2 Referrals when a person leaves

Where the legal criteria are met, the organisation will make a referral to the Disclosure and Barring Service, and to the Teaching Regulation Agency where applicable. Resignation, dismissal, settlement or the end of a contract will not prevent a referral or the completion of safeguarding enquiries.

21. Information sharing, confidentiality and record keeping

Safeguarding information is confidential but is not secret. Data protection law does not prevent necessary information sharing to protect a child. Staff should share relevant, accurate, proportionate and timely information with those who need it for safeguarding purposes.

- records will be stored securely with access limited to authorised staff;
- safeguarding records will be separate from general educational records;
- chronologies will be maintained where concerns are repeated or complex;
- information will be transferred securely when a child changes setting;
- the DSL will record decisions not to share information and the reasons;
- parental access requests will be considered carefully so that third-party information and child safety are protected; and
- records will be retained in accordance with legal and organisational retention requirements.

22. Working with parents, carers and partner agencies

In-Tuition Learning aims to work openly and respectfully with parents and carers. Safeguarding responsibilities and limits of confidentiality will be explained clearly. Parents will normally be informed when concerns arise or referrals are made, except where this could place a child or another person at risk, compromise an investigation or lead to evidence being destroyed.

The provision will cooperate with placing schools, commissioners, social workers, police, health professionals, youth justice, virtual schools and other relevant agencies. Placement agreements do not replace In-Tuition Learning's direct responsibility to act on safeguarding concerns.

22.1 Support following a concern, disclosure or referral

- agree a named trusted adult and how the child can contact them;
- record and review actions assigned through early help, Child in Need, Child Protection, care, safety or exploitation plans;
- consider changes to timetable, group, room, transport, online access and adult contact without unnecessarily restricting the child's education;
- maintain communication with the child and explain outcomes that can lawfully be shared;

- monitor attendance, presentation, peer relationships, retaliation, online contact and emotional wellbeing; and
- continue support when a criminal, social-care or employment process ends, including where an allegation is not substantiated.

22.2 Commissioning, admission and placement information

Before a placement begins, In-Tuition Learning will obtain enough information to educate and safeguard the child. Where information is missing, the provision will record the gap, pursue it and decide whether interim controls or delayed admission are necessary.

- legal name, date of birth, address, parental responsibility and emergency contacts;
- placing school, commissioner, attendance responsibility and named contacts;
- social worker, early-help lead, youth justice worker, virtual school and health contacts where applicable;
- EHCP, SEND, communication, medical, mental-health and accessibility information;
- current and previous safeguarding concerns, plans, missing episodes, exploitation, harmful sexual behaviour, violence, weapons, substance and online risks;
- risk assessments, safety plans, transport and collection arrangements;
- attendance-reporting timescales and response to unexplained absence;
- education objectives, review frequency, placement end or breakdown arrangements and information-transfer responsibilities; and
- written confirmation of which organisation retains statutory registration, attendance, exclusion and safeguarding-file responsibilities.

Serious incidents, safeguarding referrals, unexplained absence and material changes in risk will be shared promptly with the placing school and commissioner, subject to the child's safety and lawful information-sharing requirements. Subcontracted venues or services must be checked and quality assured; responsibility cannot be delegated merely by contract.

23. Training, induction and supervision

- all staff receive safeguarding and child protection induction before or at the start of work;
- all staff receive regular safeguarding updates and training in line with statutory expectations;
- the DSL completes role-specific training and refresh knowledge at required intervals;
- training covers AP-specific vulnerabilities, child-on-child abuse, online safety, exploitation, Prevent, SEND and allegations about adults;
- temporary and agency staff receive essential site-specific safeguarding information;
- staff have opportunities for supervision or debrief following complex incidents; and
- training effectiveness is checked through discussion, audits, scenarios and review of practice.

24. Site security, visitors, transport and off-site activity

24.1 Visitors and contractors

Visitors must sign in, wear identification and be supervised according to risk. Identity and safeguarding checks will be verified where a visitor will work directly with students. Staff must challenge unidentified or unauthorised persons.

24.2 Transport

Where transport is arranged or commissioned, responsibilities for drivers, escorts, handover, absence, route changes, lone travel and safeguarding incidents must be clear. Concerns arising during transport must be reported immediately and shared with the placing school or commissioner as appropriate.

24.3 Off-site education and work experience

The provision remains responsible for ensuring safeguarding arrangements are understood and proportionate. Risk assessment, supervision, emergency contacts, attendance reporting, suitability checks and communication arrangements must be agreed before placement. Any concern must be reported to the DSL without delay.

24.4 CCTV and images

CCTV, photography and video will be used only for legitimate, transparent and proportionate purposes. Images must be stored securely and accessed only by authorised persons. Personal devices must not be used to capture student images.

24.5 Restrictive interventions and physical contact

In-Tuition Learning seeks to prevent the need for restrictive intervention through relationships, planning, de-escalation, environmental adjustment and individual risk assessment. Physical intervention may be used only by authorised and appropriately trained staff where it is lawful, necessary, proportionate and the least restrictive practicable response to immediate risk.

- the child's age, disability, SEND, trauma, communication, medical needs and known triggers must be considered;
- force must never be used as punishment, to cause pain, humiliate, obtain compliance where there is no immediate risk, or because behaviour is inconvenient;
- the child must be checked for injury and offered medical assistance; parents or carers, the placing school and commissioner will be informed unless doing so would create a safeguarding risk;
- the incident, reason, duration, staff involved, techniques, injuries, witnesses and follow-up must be recorded promptly;
- the child and staff will be offered separate debriefs, and repeated use will trigger review of the plan and possible safeguarding referral; and
- any concern that force was excessive, punitive or unsafe must be reported under the allegations or low-level-concerns procedure.

24.6 Searching, screening and confiscation

Because In-Tuition Learning is an independent tuition and alternative-provision provider, staff must not assume that school statutory search powers automatically apply. Searches will normally be consensual and governed by the behaviour, safety and consent procedures. Police assistance will be sought where there is an immediate risk, a suspected weapon, illegal drugs, stolen property, indecent imagery or another suspected offence.

- the DSL must be informed where a search or confiscation has a safeguarding dimension;
- the child's dignity, sex, SEND, communication and trauma needs must be considered, and intrusive or strip searches will not be carried out by provision staff;
- two adults should be present where practicable and the reason, consent, items found, action and notifications must be recorded;
- staff must not view, copy, print or forward suspected indecent images of children; devices should be secured and police advice obtained; and
- confiscated items must be stored, returned, disposed of or passed to police in accordance with law and the relevant organisational procedure.

25. Monitoring, quality assurance and review

The proprietor and DSL will monitor the effectiveness of this policy through safeguarding audits, record sampling, referral and incident review, attendance analysis, training checks, staff and student feedback, allegations and low-level concern review, safer recruitment checks and annual filtering and monitoring review.

Monitoring will include at least termly review of safeguarding records and themes, and an annual formal audit. The review will identify actions, named owners, deadlines and evidence of completion. Learning from local and national safeguarding practice reviews, complaints, staff concerns, student voice and commissioner feedback will be incorporated.

- contact information and referral routes will be checked at least termly and whenever the local authority publishes a change;
- staff knowledge will be tested through scenarios and supervision rather than attendance certificates alone;
- the independent safeguarding reviewer will report strengths, weaknesses and overdue actions to the proprietor; and
- the policy will be reviewed after a serious incident, allegation, significant complaint, change in delivery model, premises or technology, or relevant legal and local-procedure change.

Appendix 1: Immediate safeguarding response

1. Ensure immediate safety. Call 999 if there is immediate danger or a crime in progress.
2. Listen and reassure; do not investigate.
3. Report to the DSL immediately. If the DSL is unavailable, use the published safeguarding cover or direct-referral arrangements without delay.
4. Make a factual, dated record.
5. DSL assesses risk and makes referrals without delay.
6. Record the decision, action, outcome and follow-up.
7. Escalate if the response from another agency does not protect the child.

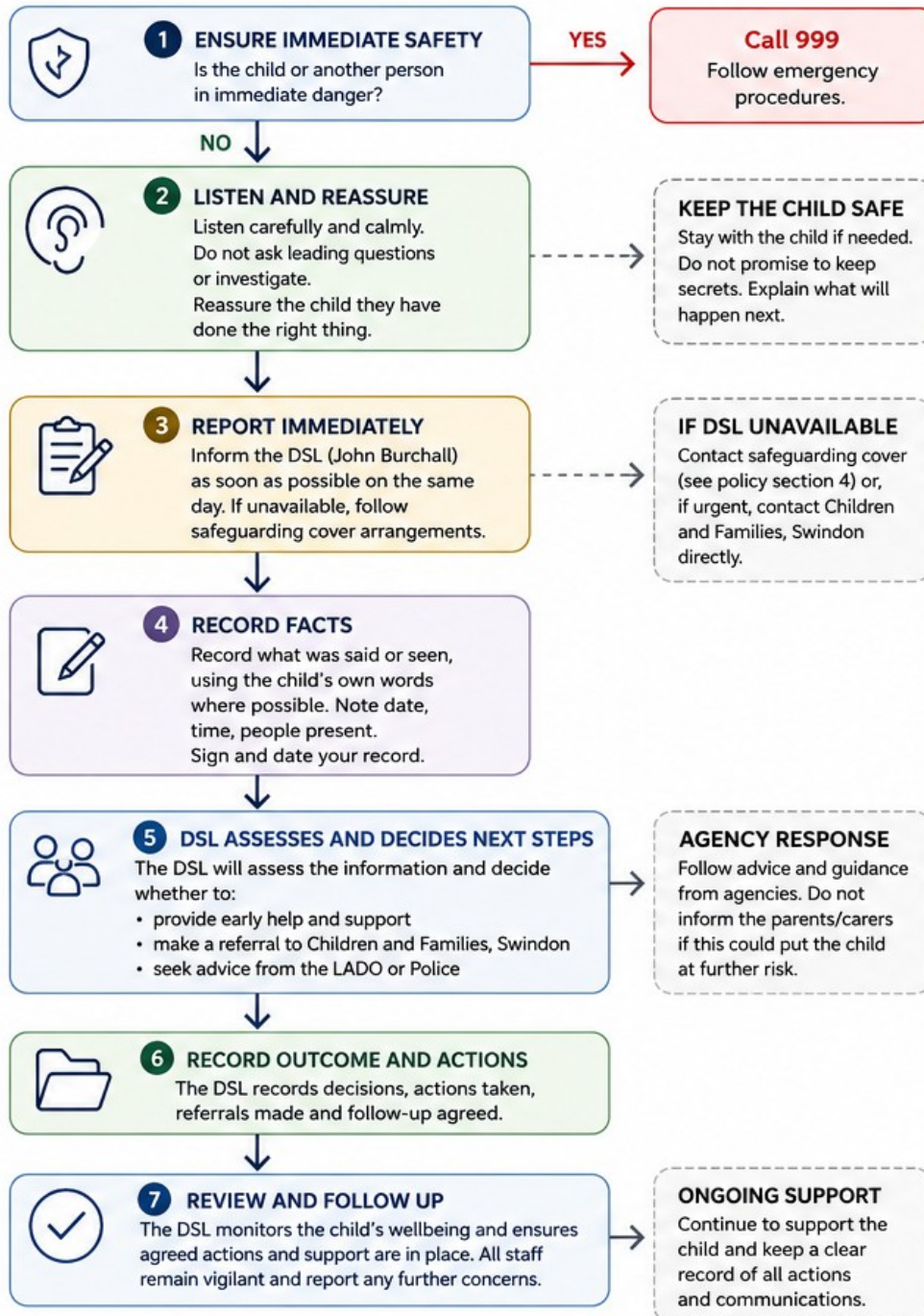
Appendix 2: Responding to a disclosure

Do	Do not
Listen and take the child seriously	Promise confidentiality
Use open prompts only	Ask leading or repeated questions
Record exact words	Interpret, diagnose or investigate
Report immediately	Wait for proof
Explain what will happen next	Confront the alleged perpetrator
Preserve evidence	View, copy or circulate illegal images

Appendix 3: Response to a Safeguarding Concern or Disclosure Flow Chart

APPENDIX 3 Response to a Safeguarding Concern or Disclosure Flow Chart

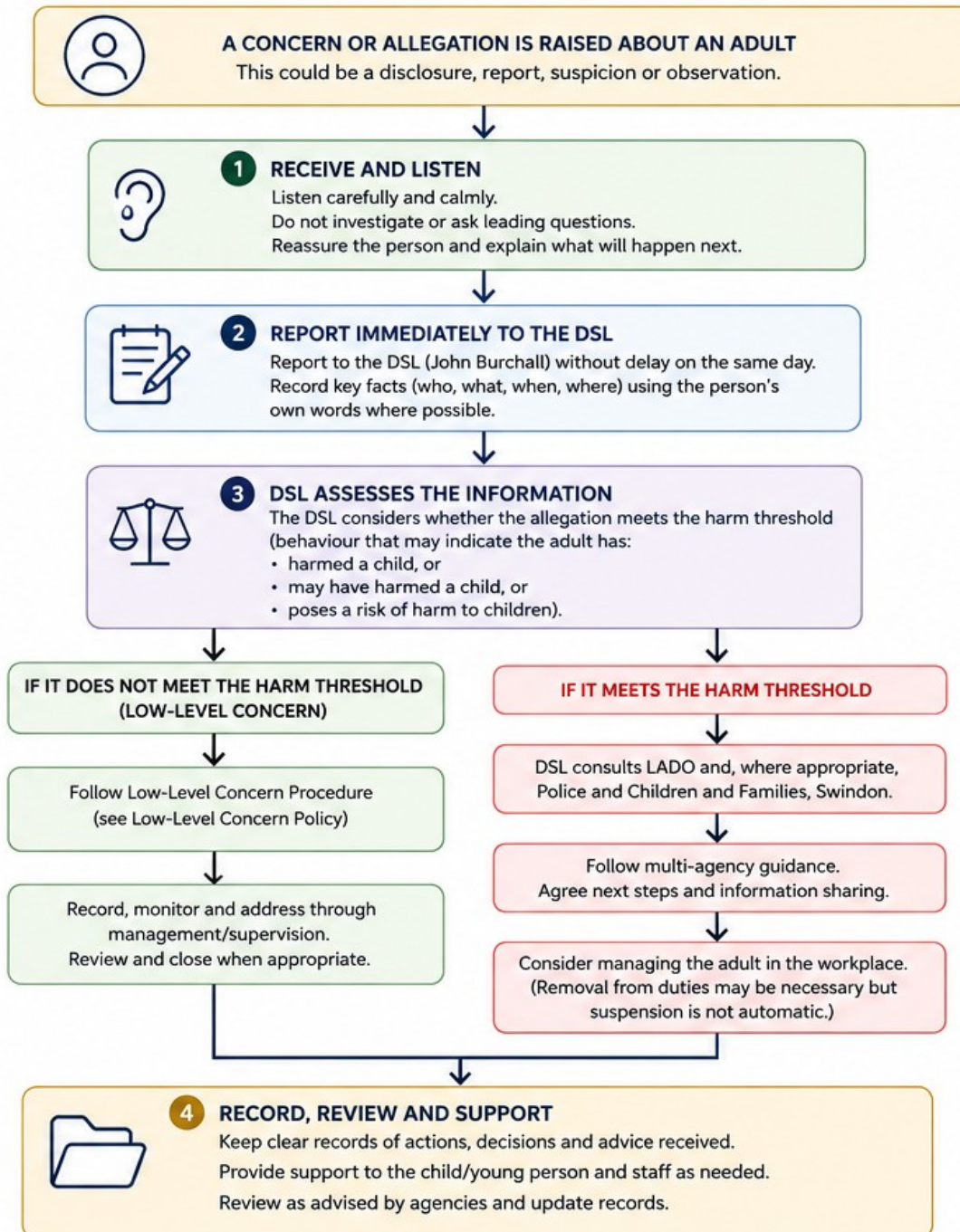
For all staff and visitors



Appendix 4: Allegations or Concerns About an Adult Flow Chart

APPENDIX 4 Allegations or Concerns About an Adult Flow Chart

For staff, volunteers, visitors, contractors and tutors



Appendix 5: Local and national contacts

Children and Families, Contact Swindon	01793 464646 / contactchildrenandfamilies@swindon.gov.uk	Safeguarding concerns, requests for help and support
Emergency Duty Service	01793 445500, option 4	Out-of-hours safeguarding emergency
Swindon LADO	01793 463854 / LADO@swindon.gov.uk	Allegations about adults who work with children
Police	999 / 101	Immediate danger / non-emergency crime advice
NSPCC	0808 800 5000	Advice about a child
NSPCC whistleblowing advice	0800 028 0285	Concerns about how safeguarding is being handled
Childline	0800 1111	Confidential support for children and young people

Appendix 6: Legal and statutory framework

This policy should be read alongside current versions of:

- Keeping Children Safe in Education (current statutory guidance), adopted as the principal safeguarding benchmark for this provision;
- Working Together to Safeguard Children 2026;
- Prevent duty guidance: England and Wales (2023);
- Meeting digital and technology standards in schools and colleges - filtering and monitoring core standard;
- Children Act 1989 and Children Act 2004;
- Education Act 2002, where applicable;
- Counter-Terrorism and Security Act 2015;
- Data Protection Act 2018 and UK GDPR;
- Equality Act 2010;
- Human Rights Act 1998;
- Sexual Offences Act 2003;
- Female Genital Mutilation Act 2003;
- Serious Crime Act 2015;
- Domestic Abuse Act 2021; and
- Swindon Safeguarding Partnership procedures and escalation arrangements.

Related internal policies should include staff code of conduct, safer recruitment, online safety and acceptable use, behaviour, attendance, anti-bullying, whistleblowing, complaints, data protection, physical intervention, educational visits, lone working and health and safety.

Appendix 7: Remote and one-to-one tuition safeguarding checklist

- Session, tutor, learner, date, time and approved location/platform confirmed.
- Parent/carers and emergency contact details available.
- Known risk, communication, SEND and safety-plan information reviewed.
- Visibility, check-in, collection, transport and lone-working controls confirmed.
- Approved organisational account and device used.
- Any concern, non-attendance, interrupted session or disclosure reported and recorded.

Appendix 8: New-placement safeguarding information checklist

- Identity, parental responsibility and emergency contacts.
- Placing school, commissioner and attendance contacts.
- Social-care, early-help, youth justice, health and virtual-school contacts.
- Current plans, risks, incidents, missing episodes and restrictions.
- SEND, EHCP, communication, medical and mental-health needs.
- Transport, collection, online access and venue arrangements.
- Review dates, reporting timescales and information-transfer responsibilities.

Appendix 9: Filtering and monitoring review record

- Date, participants and systems/providers reviewed.
- Learner and staff risk profile, including SEND, remote use, BYOD and AI.
- Devices, accounts, sites, guest networks and off-site coverage tested.
- Categories blocked and monitoring-alert response tested.
- Gaps, compensating controls, actions, owners and completion dates.
- Approval and assurance by proprietor and independent safeguarding reviewer.

Appendix 10: Swindon safeguarding referral route

1. Immediate danger or crime in progress: Police 999.
2. Office-hours safeguarding concern: Children and Families, Contact Swindon - 01793 464646; professionals complete the current Request for Help and Support / RF1 form.
3. Out-of-hours urgent safeguarding concern: Emergency Duty Service - 01793 445500, option 4.
4. Allegation about an adult working with children: Swindon LADO - 01793 463854; LADO@swindon.gov.uk.
5. Record advice, referral reference, decision, follow-up and any escalation.

Appendix 11: Child support and safety planning checklist

- Child's wishes, feelings and preferred communication.
- Named trusted adult and safe means of contact.
- Immediate safety at home, on-site, online, in transport and in the community.
- Contact, timetable, room, peer and adult restrictions.
- Health, emotional, advocacy and specialist support.
- Actions required by statutory or multi-agency plans.
- Review date, responsible people and how the child will be updated.