



## Child Protection Policy

## Aim and Responsibility

The primary aim of this policy is to safeguard and promote the welfare, safety, and health of all learners accessing our provision, fostering an honest, open, and supportive climate.

We recognize that the welfare of our learners is of paramount importance. We commit to addressing all safeguarding and child protection concerns in a timely and robust manner. The procedures outlined herein ensure that immediate action is taken where a learner is believed to be at risk of significant harm or abuse is alleged. The interests and safety of the learner(s) must always be the prime concern.

The Senior Designated Safeguarding Lead (DSL), Siobhan Stevenitt, is responsible for maintaining all child protection files and overseeing the safeguarding of learners.

## Review and Accountability

This Child Protection Policy will be reviewed by the Senior DSL, Siobhan Stevenitt, on a regular basis to ensure it remains current and incorporates all revisions to local and national safeguarding guidance. As a minimum, a full review will be conducted once a year during the autumn term and submitted to the Director of Prime Tutors for formal approval and sign-off.

Prime Tutors is a dedicated Alternative Provision (AP) provider serving Nottinghamshire, committed to delivering education to learners who cannot access mainstream settings.

We are dedicated to placing the welfare and safety of every learner at the heart of our practice. Our provision is built on forming trusting relationships with learners, families, and carers, supporting young people as they navigate life's challenges.

We provide bespoke educational packages designed to encourage both academic and personal potential, while celebrating all achievements and ensuring a safe learning environment. All staff are required to act in the best interests of learners and strictly adhere to Child Protection legislation and procedures.

Role	Name	Contact Details
Designated Safeguarding Lead	Siobhan Stevenitt	07936422745
LA Safeguarding Children in Education Officer	Zain Iqbal	0115 8041047 <a href="mailto:Zain.Iqbal@nottscc.gov.uk">Zain.Iqbal@nottscc.gov.uk</a>
LA Child Protection Contact/LADO	Eva Callaghan or covering LADO.	0115 8041272
MASH (Multi-agency Safeguarding Hub)		0300 500 80 90
MASH Consultation Line	Office hours	
Emergency Duty Team (Children's Social care)	Outside of office hours	0115 977 4247 0300 456 4546
Police (to report a crime and immediate risk of harm or abuse to child)	101	In an emergency 999 (only)
NSPCC Help whistleblowing line	line is available 8.00am to 8.00pm Monday to Friday	0800 028 0285- email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

## Prime Tutors

Our policy applies to all staff and volunteers working at Prime Tutors and takes into account statutory guidance provided by the Department for Education and local guidance issued by the Nottinghamshire Safeguarding Children Partnership.

We will ensure that all parents/carers are made aware of our responsibilities regarding child protection procedures and how we will safeguard and promote the welfare of their children through the publication of this Child Protection policy, and the duties and responsibilities, as set out within the Education Act 2002 sec175 and 157, DfE Statutory Guidance Keeping Children Safe in Education 2025 and HM Working Together to Safeguard Children 2023 (published 15<sup>th</sup> December 2023, updated February 2024), which are incorporated into this policy.

## Our Pledge to Pupils

Prime Tutors recognizes its moral and statutory responsibility to safeguard and promote the welfare of every learner. We are committed to maintaining a safe, welcoming, and respectful environment where children feel valued. Our staff are trained to be alert to the signs of abuse and neglect and will rigorously follow all procedures to ensure children receive the effective support, protection, and justice they deserve.

## Policy Scope and Consistency

The safeguarding procedures outlined in this policy apply to all individuals affiliated with Prime Tutors, including:

- Permanent Staff
- Supply Staff
- Volunteers
- Contractors

These procedures are fully consistent with the guidelines set by the Nottinghamshire Safeguarding Children Partnership (NSCP).

## A Child-Centered and Coordinated Approach

### Collective Responsibility

We operate on the fundamental principle that safeguarding and promoting the welfare of children is everyone's responsibility. Every person who comes into contact with children and their families has a vital role to play in the wider safeguarding system.

### Focus on the Child

To fulfill this responsibility effectively, all our staff, supply staff, and volunteers will ensure their approach is child-centered. They will be supported to consistently consider what is in the best interests of the child at all times.

### Information Sharing and Prompt Action

We understand that no single professional holds the complete picture of a child's needs. If children and

families are to receive the right help at the right time, coordinated action is essential. Therefore, every staff member has a duty to:

1. Identify concerns.
2. Share relevant information.
3. Take prompt action.

Safeguarding children is defined as: The actions we take to promote the welfare of children and protect them from harm are everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment.
- Preventing the impairment of children's mental and physical health or development. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Safeguarding and promoting the welfare of children is defined in line with pertinent legislation including KCSIE 2025. For the purposes of this document, safeguarding is defined as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

\*Children includes everyone under the age of 18.

NB Definition: Children includes everyone under the age of 18.

## Prime Tutors' Safeguarding Approach

Our approach to safeguarding is proactive, preventative, and collaborative, recognizing the vital role every staff member plays in protecting our learners.

### The Role of Our Staff

Every member of Prime Tutors staff is in a unique position—both within and outside the learning environment—to identify concerns early, provide timely support, and promote a child's welfare. We recognize the importance of these relationships in preventing issues from escalating.

### Proactive Safety and Early Help

1. Safety Review: We have a primary responsibility to provide a safe environment for learning. We will regularly review and update our safeguarding arrangements to ensure their effectiveness and to confirm the safety of all children and staff.
2. Early Intervention: We are committed to identifying children who may benefit from early help. We will proactively put support in place as soon as a problem emerges, regardless of the child's age

or stage in life.

## Reporting and Accountability

Any staff member who has any concern regarding a child's welfare must follow the processes set out in this Child Protection Policy and raise the concerns with the Designated Safeguarding Lead (DSL) or Deputy without delay.

## Professional Cooperation

All staff should expect to fully cooperate with social workers and other agencies following a referral, particularly if they were instrumental in identifying the concern or received a disclosure of risk, harm, abuse, or harassment from a child.

## Designated Safeguarding Lead (DSL) Oversight

The Senior Designated Safeguarding Lead (DSL) and any deputies are responsible for maintaining the most complete safeguarding picture. They will:

- Provide support to all staff in carrying out their safeguarding duties.
- Liaise closely with external services such as Children's Social Care, the Police, Health services, and the Nottinghamshire County Council (NCC) Early Help Service.
- Serve as the primary advisor on the appropriate response to all safeguarding concerns.

## Key Categories of Safeguarding Scope

The text you provided can be summarized into two main categories: the Broader Aspects of Care and Specific Potential Harms/Vulnerabilities.

### 1. Broader Aspects of Care and Welfare (Proactive Safeguarding)

This highlights the proactive measures Prime Tutors takes to ensure a supportive environment:

- Health & Well-being: Covering emotional well-being, mental/physical health, and development.
- Inclusive Education: Meeting the needs of learners with SEN and/or disabilities, including providing reasonable adjustments (in line with the Equality Act).
- EHCP Management: Ensuring the Local Authority (LA) is provided with necessary details for children receiving elective home education who have an Education, Health and Care Plan (EHCP).
- Physical Safety: Including health and safety, first aid, managing medical conditions, and securing the school environment (considering local context).
- Behaviour Management: The use of 'reasonable force' and inclusive behaviour strategies.
- Activity Safety: Covering educational visits and off-site education.
- Personal Care: Addressing intimate care and emotional well-being.
- Online Safety: Implementation of filtering and monitoring according to DfE standards.
- Risk Mitigation: Protecting children from general risks, harm, exploitation, sexual violence, and sexual harassment between children (as guided by KCSIE 2025 Annex A).

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### 2. Specific Potential Harms and Vulnerabilities (Reactive Safeguarding)

This lists the wide range of issues staff must be alert to and report:

#### A. Abuse and Exploitation

- Direct Abuse: Neglect, physical abuse, sexual abuse, and emotional abuse.
- Contextual/Extra-Familial Abuse: Harm occurring outside the home (including gang activity, organised crime, County Lines, and CCE).
- Sexual Harms: Child sexual exploitation, sexual violence and sexual harassment (Child-on-Child Abuse), 'sexting', accessing pornography, and 'Upskirting' (a criminal offence under the Voyeurism Act 2019).
- Trafficking & Slavery: Human trafficking, modern slavery, and criminal exploitation.

#### B. Identity, Prejudice, and Extremism

- Discriminatory Abuse: Racist, disability-based, homophobic, bi-phobic, or transphobic abuse.
- Gender-Based Violence: Domestic abuse (including teenage relationship abuse), gender-based violence, violence against women and girls, Female Genital Mutilation (FGM), and Honour-Based Abuse.
- Extremism: Risk of extremist behaviour and/or radicalisation (preventing susceptibility to being drawn into terrorism).
- Forced Marriage: Being subject to conduct where the purpose is to cause a child to marry before 18 (Law change, February 2023).

#### C. Vulnerable Circumstances & Welfare

- Attendance Issues: 'Deliberately missing education', unexplained/persistent absence (including for part of the day), or children 'missing from care or home'.
- Home/Family Factors: Young carers, children privately fostered, children returned home from care, or children affected by parental offending (e.g., family member in prison), drug/alcohol misuse, adult mental health issues, and domestic abuse/harm.
- Mental Health & SEN: Children with mental health needs affecting attendance/progress, and children with SEN (with or without an EHCP).
- Crime & Violence: Involvement in knife crime, youth violence, being in possession of a knife, or at risk from serious violence.
- Exclusion Risk: At risk of suspension or permanent exclusion.

## Staff Awareness and Early Reporting

### Recognition and Identification

It is vital that all Prime Tutors staff and volunteers are fully aware of the indicators of abuse and neglect. This includes specific knowledge of the signs linked to serious issues such as Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE). This knowledge is essential for early identification so that appropriate support and protection measures can be put in place promptly.

### Reporting Procedures

Any staff member or volunteer who has concerns that a child may be in need of help or protection must report those concerns without delay to:

1. The Designated Safeguarding Lead (DSL).

2. A member of the Senior Leadership Team, if the DSL is unavailable.

## Professional Curiosity and Disclosure

We recognize that children may face significant barriers to disclosure, including:

- Not feeling ready or knowing how to tell someone.
- Not recognizing their own experiences as harmful.
- Feeling embarrassed, humiliated, or having been threatened not to tell.
- Vulnerabilities related to disability, sexual orientation, or language barriers.

These potential barriers must not prevent staff from acting. Staff must maintain professional curiosity and immediately discuss any concerns about a child with the DSL. The DSL will then help determine the best way forward, which includes how to build trusted relationships with children and young people to facilitate safe opportunities for communication.

## Mandatory Action

All staff must always speak to the Designated Safeguarding Lead, or Deputy, at the earliest opportunity regarding any welfare concern.

# The Complexity of Risk and Required Vigilance

## Interconnected Concerns

Prime Tutors staff must understand that abuse, neglect, and safeguarding incidents are rarely isolated events that fit neatly under a single label. In most cases, multiple issues overlap, creating complex circumstances for the child. Due to this complexity, all staff must maintain constant vigilance and always raise any concerns immediately with the Designated Safeguarding Lead (DSL) or Deputy.

## Extra-Familial Harm (Contextual Safeguarding)

We recognize that safeguarding incidents and harmful behaviours are frequently associated with factors outside the Prime Tutors environment and can occur between children away from the school setting.

All staff receive training on the risks posed by extra-familial harm (also known as Contextual Safeguarding). Children can be vulnerable to multiple, interconnected harms outside their family unit, including, but not limited to:

- Sexual Exploitation
- Criminal Exploitation (e.g., County Lines and trafficking)
- Sexual Abuse
- Serious Youth Violence

## Online Safety and Technology Risks

While technology offers many educational opportunities, it is a significant component in many safeguarding and well-being issues. Children face risks of abuse both online and face-to-face.

Staff must be aware of peer-on-peer abuse facilitated by technology, which includes:

- Abusive, harassing, and misogynistic messages.

- The non-consensual sharing of indecent images (especially in chat groups).
- The sharing of abusive images and pornography with unwilling recipients.

## ICT Systems and Monitoring

To mitigate online risks, all staff have an understanding of the expectations and their roles related to the filtering and monitoring of ICT systems. We conduct regular monitoring of Prime Tutors' equipment and networks.

Our detailed Online Safety Policy outlines the specific filtering and monitoring arrangements for all ICT devices and networks, which is incorporated into this Child Protection Policy. This includes specific awareness of the vulnerabilities associated with accessing mobile phone networks.

## Generative AI: product safety expectations

This policy ensures all use of generative AI (Gen-AI) within our provision, protects pupils, staff and data, and aligns with UK Government expectations for safe, ethical AI use. AI must never replace human judgment in safeguarding or educational decisions.

Applies to all staff, pupils, contractors, and any Gen-AI tools used in teaching, learning, administration, or wellbeing support.

We follow UK Government guidance including:

- Generative AI: Product Safety Expectations (DfE, 2024)
- Generative AI Framework for HMG (Cabinet Office, 2024)
- Guidance to Civil Servants on AI Use (2023)

## Our Principles:

1. Safety first – AI use must never expose pupils to harmful, biased or inappropriate content.
2. Human oversight – AI outputs must be reviewed by a member of staff before use.
3. Data protection – No personal, pupil or sensitive data is entered into public AI systems.
4. Transparency – Pupils and parents are told when AI is used and why.
5. Accountability – Staff remain responsible for decisions; AI assists, it does not decide.
6. Appropriateness – AI use must support education, wellbeing or administrative tasks, not entertainment or risk-taking.

## Safe Use & Controls

- Risk assessment: Check every new AI tool before use — particularly where pupils are involved.
- Procurement: Only use AI tools approved by the school's leadership/IT lead.
- Filtering & monitoring: AI tools used with pupils must have strong content filters.

- **Supervision:** Pupils must be supervised when using any AI system.
- **Data input:** Never enter names, personal stories, photos or identifiers into AI systems.
- **Oversight:** Staff must check AI outputs for accuracy, bias or harmful material.
- **Incident response:** Any inappropriate AI output or safeguarding concern must be reported immediately to the DSL.

## Training & Awareness

- Staff receive short annual training on safe and ethical AI use.
- Pupils are taught basic AI awareness — including what AI can and cannot do safely.
- Parents are informed about AI tools used and given contact points for questions.

## Review & Monitoring

- Policy reviewed annually or after any AI incident.
- AI use logged and reviewed termly by SLT and DSL.
- Non-compliance may result in disciplinary or safeguarding action.

## Quick Safeguarding Rules for AI in Our AP

- Always keep a human in control
- Use only approved tools
- Never share personal data
- Report any harmful or concerning output to DSL
- Use AI to support learning and safety, not replace professional judgment

<https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>

# Online Safety Accountability and Strategy

## Director and DSL Oversight

The Designated Safeguarding Lead (DSL) holds the primary operational responsibility for online safety. This area is subject to regular review and oversight by the Company Directors.

The Director will ensure strategic oversight of the Online Safety Policy, which is integrated into our main child protection policy. This includes reviewing the arrangements for appropriate filtering and monitoring across all Prime Tutors devices and networks. The suitability of these systems will be informed, in part, by the risk assessment required under the Prevent Duty.

## Adherence to Filtering and Monitoring Standards

To comply with Department for Education (DfE) filtering and monitoring standards, Prime Tutors commits to the following actions:

- Role Assignment: Clearly identify and assign roles and responsibilities for managing filtering and monitoring systems.
- Annual Review: Review all filtering and monitoring provision at least annually.
- Harm Blocking: Effectively block harmful and inappropriate content without unreasonably disrupting teaching and learning.
- Effective Monitoring: Maintain effective monitoring strategies that meet the safeguarding needs of our learners.
- Standard Review: Review and discuss these standards with the Leadership Team, IT staff, and service providers to ensure full compliance with published DfE standards.

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## Combatting Online Misinformation and Disinformation

At Prime Tutors, we are actively strengthening our online safety measures in line with Keeping Children Safe in Education 2025 (KCSIE 2025), with a specific focus on protecting our vulnerable learners from misinformation and disinformation.

Our comprehensive approach combines education, monitoring, and pastoral support:

- Critical Digital Literacy: We integrate teaching that encourages pupils to think critically about content they encounter online. This helps them recognize false or misleading information and understand its potential impact on their well-being and behaviour.
- Targeted Monitoring: Our digital monitoring systems are specifically configured to flag content that is harmful or misleading, including conspiracy content or targeted narratives.
- Staff Training: Staff receive regular training to help them identify subtle signs that pupils may be negatively affected by online misinformation.
- Support Pathway: When concerns arise, staff work directly with the DSL to provide timely guidance and necessary support.

By combining proactive technical monitoring with digital literacy education, we aim to help our pupils build the necessary resilience and judgment to remain safe, informed, and confident online.

For further details regarding our technical arrangements, please consult our full E-Safety Policy by emailing [info@primetutorsnottingham.co.uk](mailto:info@primetutorsnottingham.co.uk).

## Leadership, Policy, and Supportive Response

### Strategic Review and Communication

Senior leaders at Prime Tutors are responsible for maintaining a continuous review of our filtering and monitoring standards. They will consult regularly with IT staff and service providers to ensure the necessary measures are in place, constantly asking what more can be done to meet and maintain the highest standard for our alternative provision setting.

Crucially, these standards and safety provisions will be clearly communicated to:

- Staff and pupils.
- Parents and carers.
- Visitors and community venues where our work is carried out.

## DSL Responsibility and Parental Engagement

The Designated Safeguarding Lead (DSL) will always act in the 'best interest of the child'. The DSL remains mindful of the importance of engaging parents and carers regarding specific safeguarding concerns, particularly issues related to the child's online access when away from Prime Tutors' supervision.

We commit to supporting the wider community's understanding of harmful online challenges and hoaxes by sharing relevant information with parents and carers about risks and where they can access external help and support.

## Zero Tolerance for Harassment and Abuse

All our policies explicitly state that we adopt a 'zero tolerance' approach to all forms of abuse or harassment, as informed by DfE statutory guidance (KCSIE). All incidents will be reported strictly in accordance with national safeguarding guidance.

## Responding to Disclosures

Should a child make a disclosure or report an incident, our staff will always:

- Reassure the child that they are being taken seriously.
- Confirm they will be supported and kept safe.

We recognize that not every victim will view themselves as such. We will also be mindful when using terminology like 'alleged perpetrator(s)', as in some cases, the abusive behaviour may be indicative of underlying harm being experienced by the perpetrator as well.

## Inter-agency Cooperation and Pathway to Provision

To ensure all concerns are addressed fully, we will cooperate closely with relevant statutory safeguarding agencies. Our aim is to ensure children understand that the law on Child-on-Child Abuse exists to protect them rather than necessarily criminalize them.

We will work with partners to ensure different types of assessment and support services are put in place where required, strictly adhering to the Nottinghamshire County Council and the Nottinghamshire Safeguarding Children Partnership Pathway to Provision (threshold guidance for referral and access to services).

## Identifying and Responding to Concerns

### Required Knowledge and Vigilance

Every member of staff, volunteer, and governor at Prime Tutors is required to know:

1. How to identify a pupil who may be experiencing harm.
2. How to respond sensitively and correctly to a pupil who discloses abuse.
3. The procedures to follow when others raise concerns about a pupil.

Staff must understand that abuse, neglect, and safeguarding issues are rarely isolated events; multiple issues often overlap. Therefore, staff must remain constantly vigilant and not rely on a single definition for identification.

## Training and Reporting Duty

All Prime Tutors staff and volunteers have received mandatory safeguarding training to ensure they can recognize the indicators of child abuse, harm, or neglect.

Staff who regularly come into contact with children are familiar with the procedures and guidance outlined in the DfE publication, 'What to do if you're worried a child is being abused'.

Any staff member who becomes aware of an incident or concern (either directly alerted or indirectly informed) must immediately speak to the Designated Safeguarding Lead (DSL) or Deputy.

## Definitions and Indicators of Abuse and Neglect

### The Definition of Abuse

Abuse is a form of maltreatment of a child. It can involve inflicting harm or failing to act to prevent harm. Harm is defined broadly and includes non-physical ill-treatment and the impact of witnessing the ill-treatment of others (e.g., all forms of domestic abuse).

Abuse can occur:

- In any setting: family, institutional, or community.
- By any person: those known to them or, rarely, by strangers.
- Online or Offline: Technology can be the location of abuse or used to facilitate offline harm.
- By Adults or Children: Abuse can be perpetrated by adults or another child/group of children (Child-on-Child Abuse).

The four recognized categories of child abuse are: Physical Abuse, Emotional Abuse, Sexual Abuse, and Neglect.

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### Key Definitions of Abuse Categories

Category	Definition and Indicators
Physical Abuse	Involves actively causing physical harm (e.g., hitting, shaking, burning, poisoning, suffocating) or fabricating/inducing illness in a child.
Emotional Abuse	Persistent emotional maltreatment causing severe, adverse effects on a child's emotional development. This includes conveying worthlessness, restricting a child's views, serious bullying (including cyberbullying), exploitation, or witnessing the ill-treatment of another.

Sexual Abuse	Forcing or enticing a child to partake in sexual activities, with or without violence or physical contact. This includes: physical contact (assault by penetration or non-penetrative acts), non-contact activities (viewing or producing sexual images, grooming), and Child-on-Child Abuse.
Neglect	The persistent failure to meet a child's basic physical and/or psychological needs, likely resulting in serious impairment of their health or development. This can involve inadequate food/clothing, failure to protect from harm, inadequate supervision, or neglecting emotional needs.

## Prime Tutors' Culture of Vigilance and Support

### Vulnerability and Training

Prime Tutors acknowledges the unique vulnerability of the learners we work with, necessitating extraordinary vigilance from all staff to notice indicators of emerging threats or harm.

To ensure staff confidence and competence, we provide:

- Annual Safeguarding Refresher Training.
- Ongoing Safeguarding Updates from the DSL.
- Mandatory Safeguarding Training throughout the academic year.

Staff are also aware that behaviours such as drug/alcohol misuse, deliberately missing education, and the sharing of nudes/semi-nude images are themselves safeguarding issues that indicate a child is at risk.

### E-Safety and Parental Communication

We recognize that the use of digital devices and media platforms poses significant risks, requiring extreme vigilance, especially in an alternative provision setting.

- Parent/Carer Briefing: During initial home visits, parents/carers are informed of our e-safety procedures and signposted to resources on exploitation, grooming, and radicalisation.
- Open and Positive Culture: Our ethos embeds an open and positive culture for safeguarding where information is shared effectively and in a timely manner to meet local thresholds. We ensure our environment makes every individual feel safe, cared for, listened to, and supported.

### Learner-Centered Approach and Induction

Our ethos is built on putting learners at the center of all decisions. Effective safeguarding is only achieved by listening to children and hearing what they say.

- Positive Relationships: We aim to foster positive relationships through consistent staffing,

- allowing for the formation of trusting relationships with learners and families.
- Learner Induction: All learners receive a detailed induction where their communication preferences are established. They are given specific, child-friendly information about how to report concerns and access support.

## Response and Escalation

Prime Tutors is led by staff committed to providing a safe environment and a vigilant culture. In cases of concern, we respond with appropriate and timely action for children who need help or who are suffering, or likely to suffer, significant harm.

- Decision-Making: Where a child is not in immediate danger, staff must always decide on the course of action in conjunction with the DSL.
- Right to Escalate: Staff are empowered to escalate their concerns and contact MASH, the MASH Consultation Line, or social care if, despite discussion with the DSL, their concerns remain unresolved.
- Whistleblowing: Staff are informed of the whistleblowing procedures and provided with contact details for the Local Authority LADO and the NSPCC helpline.

## Information Sharing and Data Protection

Information sharing is vital in identifying and tackling all forms of abuse and neglect. Learning Managers/staff must be proactive in sharing information early to help identify, assess, and respond to risks.

Prime Tutors adheres to the Data Protection Act 2018 and GDPR, ensuring that all personal information is processed fairly, lawfully, and kept safe and secure.

## Actions Where There Are Concerns About a Child (KCSIE 2025 Key Elements)

When a concern about a child's welfare arises, the following actions must be taken swiftly:

KCSIE 2025 Action	Prime Tutors Requirement
Recognition	Staff and volunteers must be able to recognize indicators of harm or abuse (including extra-familial and online risks).
Response	Staff must respond sensitively and appropriately to disclosures or concerns, following established procedures.
Inform DSL	Immediately inform the Designated Safeguarding Lead (DSL) or Deputy in line with company policy.

# Safeguarding Responsibility for Alternative Provision

## Responsibility of the Commissioning School

The commissioning school (the mainstream school placing the pupil) retains the primary responsibility for the safeguarding of that pupil. The school must be satisfied that Prime Tutors, as the AP provider, can effectively meet the pupil's specific needs, vulnerabilities, and any associated risks of harm.

## Information Sharing for Vulnerable Learners

As children accessing alternative education often have complex needs, effective information sharing is vital to supporting the child.

- Trust and Governing Bodies must ensure pupils are fully supported and that Prime Tutors is aware of any additional risks of harm the pupil may be vulnerable to.
- Prime Tutors' Commitment: We will ensure that up-to-date contact details for all professionals working with the child and family are secured and readily available to our DSL.
- Working Together Principles: We adhere to the principles of 'Working Together to Safeguard Children' to ensure a holistic understanding of the pupil's vulnerabilities and needs.

## The Designated Safeguarding Lead (DSL) Role

The DSL at Prime Tutors, who is familiar with national and local guidance, is the key point of contact for external agencies.

### Multi-Agency Liaison

The DSL will actively liaise with all appropriate agencies, including, but not limited to:

- Children's Social Care
- Police
- Youth Justice Services (YJS)

## Supporting Learners and Staff Development

### Supporting Vulnerable Learners

Prime Tutors staff are trained to approach support with empathy and recognition of trauma:

- Self-Worth and Trauma: We recognize that children who have been abused or witnessed violence may struggle to develop and maintain self-worth, potentially feeling helpless, humiliated, and self-blaming.
- Stability: We understand that the learner's tutor may provide the only stability in the lives of pupils who have been abused or are at risk of harm.
- Behavioural Awareness: We accept that a pupil's behaviour in these circumstances can range widely, from seemingly 'normal' to aggressive or withdrawn.
- Children in Care (CiC): Supporting CiC is a key priority. We recognize that meeting their needs requires seamless inter-agency cooperation.

### Staff Training and Recruitment

Prime Tutors maintains a robust system for staff development and safety checks:

- Comprehensive Induction: All staff receive a safeguarding induction prior to commencing employment.
- Ongoing Training: Staff receive targeted safeguarding training, supplemented by weekly safeguarding updates related to national guidance.
- Accountability Checks: Staff are scheduled for termly drop-ins to review and confirm their understanding of reporting measures and appropriate actions.
- Recruitment Compliance: Prime Tutors maintains a Single Central Record (SCR) and conducts all recruitment strictly in line with Safer Recruitment Practices outlined in Keeping Children Safe in Education 2025.

## Allegations Against Members of Staff

### Procedure for Allegations

Should a member of Prime Tutors staff receive an allegation of abuse or other misconduct against themselves:

1. Immediate Contact: They must immediately contact the Director and the Designated Safeguarding Lead (DSL).
2. Do Not Intervene: Do not discuss the allegation with other staff members or approach the child involved.

The Director and DSL will consult the relevant local guidance document ("Staff facing an allegation of abuse. Guidelines on practice and procedure") and will immediately contact the Local Authority Designated Officer (LADO) or other appropriate agency officer for advice and instruction.

### Allegations Against Leadership

If an allegation is made against a member of management, the DSL will be responsible for contacting the LADO directly and seeking appropriate advice.

### Allegations Between Students

Any allegations of abuse between students (Child-on-Child Abuse) must be immediately referred to the DSL for investigation and action in line with policy.

### Staff Confidence and Support

We emphasize that awareness of these serious issues should not detract from developing positive relationships with young people. Incidents of abuse and allegations against staff are rare. Staff should feel confident knowing the correct procedure and that Prime Tutors is committed to providing full support if they are involved in a safeguarding issue.

## The DSL's Key Role in Supporting Vulnerable Learners

The DSL holds a critical role in championing and supporting the most vulnerable learners:

- Raising Awareness: The DSL actively raises awareness among all staff about the needs of children who have, or have had, a social worker. This includes highlighting the specific barriers

- they may experience regarding attendance, engagement, and achievement.
- Information Sharing: The DSL maintains data and is aware of children in the cohort who are or have been involved in the care system (including those with Looked After status). Appropriate information on individual children's circumstances is shared with teachers and staff on a need-to-know basis.

## Professional Boundaries and Online Safety

### Digital Communication Boundaries

All staff are explicitly prohibited from liaising or communicating with any young person being tutored by Prime Tutors via any form of social networking site. This message is reinforced through regular emails and dedicated "Safeguarding" updates at staff meetings.

### Promoting E-Safety

Staff must promote the safe use of all multimedia (in its widest sense, particularly internet use) and maintain vigilant monitoring.

- Acceptable Use: Learners will sign an E-Safety Acceptable Use Statement during the initial meeting with Learning Managers. Parents/carers will also be made aware of these acceptable use guidelines.

# Prime Tutors' Commitment and Action Plan

We recognize that due to the constant contact our staff have with learners, we are uniquely positioned to observe outward signs of harm and report concerns in a timely manner.

Prime Tutors will take the following actions:

## Fostering a Safe and Trusting Environment

- Secure Environment: Establish and maintain an environment where children feel secure, are encouraged to talk, and know they will be listened to and heard.
- Trusted Adults: Ensure children know that there are trusted adults they can approach if they are worried.
- External Relationships: Make every effort to establish effective working relationships with parents, carers, and colleagues from other agencies.
- Trauma-Informed Care: Acknowledge the importance of working together with parents, carers, and external services to advocate for trauma-informed and trauma-aware responses.
- Community Safety: Help create and maintain safe places and spaces within the community, ensuring children know how to access a place of safety outside of the school/college environment if needed.

## Curriculum and Skill Development (RSHE)

We will include opportunities within the RSHE curriculum for children to develop the skills needed to recognize and stay safe from abuse by:

- Risk Recognition: Educating on risks, including online safety, radicalisation and extremism, sexual exploitation, and child-on-child sexual violence and harassment, and the sharing of nude/semi-nude images (which has replaced the term 'sexting').
- Healthy Relationships: Supporting the development of healthy relationships and awareness of domestic violence and abuse, recognizing its wide-ranging impact (psychological, physical, sexual, financial, emotional) and that children can be victims who see, hear, or experience its effects.
- Mental Health Link: Recognizing the link between mental health, school attendance, and children 'absent from education' and the severe impact on learning, progress, and educational attainment.

## Mitigating Contextual and Specific Harms

- Serious Violence: Act swiftly to address any concerns related to serious violence, gang and knife crime, or child-on-child sexual violence or sexual harassment incidents.
- Extra-Familial Harm: Work in partnership with safeguarding agencies to address 'harm outside the home' (extra-familial harm), creating a culture where children can share concerns and seek support in a safe place.
- Behaviour Policy: Ensure our behaviour policy includes robust measures to prevent bullying (including cyberbullying, harmful online challenges/hoaxes, and prejudice-based/discriminatory bullying).
- Substance Misuse: Actively address drugs and substance misuse issues.
- Off-Site Support: Work with all agencies regarding missing children, anti-social behaviour/gang activity, community violence/knife crime, and children at risk of sexual exploitation.
- Young People in Custody: Support and plan for young people in custody and their resettlement

back into the community.

## Policy, Process, and Compliance

- Online Safety Policy: Maintain an updated Online Safety Policy that addresses statutory filtering and monitoring standards, takes into account remote learning, and the use of mobile/smart technology.
- Risk Minimisation: Take all reasonable measures to ensure any risk of harm to children's welfare is minimised inside and outside of our alternative education provision environment.
- Robust Arrangements: Ensure robust child protection arrangements are in place and embedded in the daily life and practice of the school.
- Staff Allegations: Ensure that procedures are in place to deal with allegations of abuse against teachers and other staff, including addressing low-level concerns as per KCSIE Part Four.
- Health and Safety: Promote pupil health and safety, provide first aid and meet the health needs of children with medical conditions, and ensure school site security.
- Shared Duty: Recognize that everyone has a duty to safeguard children both inside and outside the school environment, including during school trips, vocational placements, and alternative education packages.

## Responding Immediately to a Pupil Disclosure

It is vital that staff actions do not further harm the learner or prejudice any subsequent investigation. The primary role of the staff member receiving a disclosure is to listen, not to investigate.

### Do's and Don'ts During Disclosure

Do (Required Action)	Don't (Prohibited Action)
Listen calmly; try not to show shock.	Investigate (e.g., asking leading questions like "What did s/he do next?").
Accept what the learner says.	Promise confidentiality (explain that you must tell the DSL).
Acknowledge how hard it was for the learner to tell you.	Criticise the perpetrator (the learner may still have a relationship with them).
Observe bruises; stay calm and let	Ask the pupil to remove clothing

the pupil dictate the pace.	to observe injuries.
Reassure the pupil they did the right thing; explain whom you must tell (the DSL) and why.	Burden the pupil with guilt (e.g., asking "Why didn't you tell me before?").
Explain the next stage (depending on age).	Make promises you cannot keep (e.g., "I'll stay with you all the time").

## Reporting Concerns and Staff Duty of Care

Staff at Prime Tutors have a 'duty of care' to ensure that all known or suspected abusive situations are dealt with according to the clear guidance and procedures established by the Local Authority.

### Staff Requirements

- Alertness: Staff must be alert to signs and symptoms of harm or abuse.
- Response: Staff must know how to respond when they have concerns or when a learner discloses to them and take appropriate actions.
- Training: Staff must undergo regular child safeguarding training, updated in line with advice from the local Safeguarding Boards (whole staff training required every 3 years).

### Reporting Concerns to Designated Leads

Any concern should be discussed, in the first instance, with one of the designated leads as soon as possible.

Note: If at any point there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or the Police immediately. Any individual can make such a referral.

## Mental Health and Safeguarding

Staff must recognize that mental health problems can sometimes be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.

### Staff Role and Awareness

- Observation: Staff are well-placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.
- Impact of Trauma: Staff must be aware of how Adverse Childhood Experiences (ACEs), such as abuse and neglect, can have a lasting impact on a child's mental health, behaviour, and educational engagement.

- **Immediate Action:** If a mental health concern about a child is also a safeguarding concern, immediate action must be taken by following the child protection policy and speaking to the Designated Safeguarding Lead (DSL).

**Note:** Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

## Community and Specific Risks

### Child Abduction and Community Safety

- **Child Abduction (KCSIE 2025 Annex B):** This is the unauthorised removal or retention of a minor from a person with legal responsibility. Abduction can be committed by family members, known individuals, or strangers.
- **Community Safety Incidents:** Staff should be aware that incidents in the vicinity of the learning environment (e.g., people loitering nearby or unknown adults engaging children in conversation) can raise welfare concerns among pupils and parents.

### Gender Identity and Sexual Orientation

Staff must be aware that the statutory guidance for children who are lesbian, gay, bisexual, or gender questioning is subject to ongoing review, pending the final publication of the new gender questioning children guidance documents (as informed by KCSIE 2024 Paragraphs 205-209).

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## Policy Application and Review

These guidelines apply to all young people receiving tuition from Prime Tutors staff. All policies relating to Safeguarding will be reviewed annually by the Senior Designated Safeguarding Lead.

## Compliance and Governance for Safeguarding

Prime Tutors will follow the procedures set out by the Nottinghamshire Safeguarding Children Partnership (NSCP) and adhere to the statutory guidance issued by the Department for Education (DfE) in Keeping Children Safe in Education (KCSIE) 2025.

### 1. Designated Safeguarding Roles

We commit to the following mandatory leadership and specific roles:

- **Designated Safeguarding Lead (DSL):** Ensure we have a DSL who is a member of the alternative education provision leadership team and who has received appropriate training and support for this critical role.
  - The DSL role and responsibilities are formally written into their job description and specifically clarify the duties as defined in KCSIE 2025 Annex C.
- **Designated Teacher for Looked After Children (LAC):** Ensure we have a Designated Teacher for LAC.
- **Safeguarding Governance:** Ensure we have a nominated Director/Trustee responsible for child protection/safeguarding oversight.

### 2. Staff Knowledge and Responsibilities

We ensure clarity across all personnel regarding safeguarding leadership and reporting:

- Awareness of Leads: Every member of staff (including temporary, supply staff, and volunteers) and the governing body knows the name of the Senior Designated Safeguarding Lead, their deputies responsible for child protection, and their specific role.
- Reporting Protocol: All staff and volunteers understand their individual responsibility to be alert to the signs of abuse and their duty for referring any concerns to the Designated Safeguarding Lead.
- Immediate Danger: Staff are explicitly aware that if a child is in immediate danger, they must refer concerns directly to Children's Social Care or the Police.

### 3. Policy and Culture

We maintain policies that promote transparency, accountability, and safety:

- Whistleblowing: Ensure there is a clear whistleblowing policy and culture where staff feel empowered to raise concerns about unsafe practice, and that these concerns will be taken seriously and acted upon.
- Complaints System: Ensure that a formal complaints system is in place for children and families to raise issues.
- Communication to Parents/Carers: Ensure that parents and carers understand the responsibility placed on Prime Tutors staff for child protection and safeguarding by setting out our obligations clearly in the organization's prospectus and on the website.

# Reporting, Inter-Agency Liaison, and Record Keeping

## 1. Referrals and Reporting

Prime Tutors will take the following actions to ensure timely intervention and cooperation:

- Immediate Notification: Immediately notify Children's Social Care if there is an unexplained absence for a child who is subject to a Child Protection Plan and where no contact can be established with the child, parent, or appropriate linked adult.
- Agency Links: Develop and maintain effective links with relevant agencies and cooperate fully with their enquiries regarding child protection matters, including mandatory attendance at Child Protection Conferences.
- Escalation: Apply the NSCP (Nottinghamshire Safeguarding Children Partnership) escalation procedures if there are any concerns about the actions or inaction of social care staff or staff from other agencies.

## 2. Documentation and Confidentiality

Robust and secure record-keeping is essential for safeguarding:

- Written Records: Keep written records of concerns about children, even where an immediate referral is not required. This process of documenting and collating information on individual children is vital to support early identification, timely referral, and subsequent safeguarding actions.
- Security and Separation: Ensure all records are kept securely. Child protection and confidential safeguarding files must be stored separately from the main pupil file, using a secure electronic management and recording system.
- Confidentiality: Apply the principles of confidentiality appropriately, ensuring information is shared only on a need-to-know basis and in the best interest of the child.

## 3. Procedure and Compliance

- Missing Children: Ensure that we follow robust processes to respond when children are missing from education or missing from home or care.
- Staff Allegations: Develop and then follow clear procedures when an allegation is made against a member of staff or volunteer.
- Safe Recruitment: Ensure safe recruitment practices are followed at all times when appointing staff and engaging volunteers.

# Supporting and Understanding Our Learners

## Recognizing Vulnerability and Barriers to Disclosure

We recognize that many children face significant barriers when attempting to disclose abuse,

exploitation, or neglect. Learners may not recognize their experiences as harmful or may feel embarrassed, humiliated, or threatened into silence. Vulnerabilities such as disability, special educational needs (SEN), sexual orientation, or language barriers can further complicate a child's ability to seek help.

We are acutely aware that children who have been abused or witnessed violence may struggle to develop a positive sense of self-worth, leading to feelings of helplessness, humiliation, and self-blame.

## Staff Expectations and Professional Curiosity

For children at risk, Prime Tutors may represent the only stable, secure, and predictable element in their lives. Staff must recognize that a learner's behaviour—which may range from challenging and defiant to withdrawn—can be a direct manifestation of their trauma.

This complexity must not prevent staff from acting. All staff and volunteers are advised to maintain the critical attitude of 'it could happen here' regarding safeguarding concerns and always act in the best interests of the child. Staff must maintain professional curiosity and immediately speak to the DSL if they have concerns, prioritizing the development of trusted relationships that facilitate open communication.

## Prime Tutors' Mechanism of Support

Prime Tutors will endeavor to support every pupil through the following strategic actions:

### Creating a Safe and Positive Environment

- Positive Ethos: Maintain an ethos that promotes a positive, supportive, and secure environment, ensuring pupils feel valued and safe.
- Curriculum Integration: Develop curriculum content to integrate conversations related to keeping safe in the community, healthy living, and reporting abuse.
- Induction and Resources: Learners receive a detailed induction and a leaflet containing the DSL's contact details and pertinent information when they begin provision.
- Policy Support: Maintain up-to-date Behaviour Policy, Anti-Bullying Policy, and Child-on-Child Abuse Policy aligned with national and local guidance, specifically aimed at supporting vulnerable pupils.

### Proactive Intervention and Trauma Awareness

- Valuing the Learner: Proactively ensure all children know that while some behaviours are unacceptable and must be addressed, they are valued as members of our alternative provision and will be supported through the time required to deal with any harm or incident outcomes.
- Sensitive Response to Disclosure: Where a child discloses sexual violence or sexual harassment, the staff member will ensure the child is taken seriously, kept safe, and never made to feel like they are creating a problem for reporting the abuse.

### Inter-Agency Collaboration and Transition

- Liaison: Liaise with external agencies that support the pupil, including Children's Social Care (in line with the Pathway to Provision), the Behaviour and Attendance Service, and the Education Psychology Service. We utilize tools like the Early Help Assessment Form (EHAF) and engage in Complex Case Resolution Meetings.
- Information Transfer: Ensure that if a pupil leaves and is subject to a Child Protection Plan, Child in Need Plan, or has wider safeguarding concerns, their information is transferred to the new

school immediately or within 5 working days, and the child's social worker is informed.

## Supporting Children with SEN/Disabilities

- Recognizing Vulnerability: Fully recognize and support the increased vulnerability of children with SEN and/or disabilities.
- Advocacy and Collaboration: Work closely with learners and families to ensure their voices are heard and needs are accounted for. We engage in multi-agency working and collaboration to maintain the learner's best interests and outcomes.

## Roles and Responsibilities

### All Staff and Volunteers

Safeguarding and promoting the welfare of children is everyone's responsibility. Every individual who contacts children and their families has a role to play and must always consider what is in the best interests of the child.

All staff have received appropriate safeguarding training, enabling them to identify concerns early and provide the necessary help to prevent issues from escalating.

#### 1. Commitment to Early Help

We recognize that Early Help—support for children of all ages that improves a family's resilience and outcomes—is the most effective strategy. Staff should be particularly alert to the potential need for Early Help for a child who:

- Has SEN, disabilities, or mental health needs.
- Is a young carer.
- Is at risk of antisocial or criminal behaviour, including gang involvement or County Lines.
- Is frequently missing from education, home, or care.
- Has experienced multiple suspensions or is at risk of permanent exclusion.
- Is at risk of modern slavery, trafficking, sexual, and/or criminal exploitation, or radicalisation.
- Is affected by challenging family circumstances (e.g., parental drug/alcohol misuse, adult mental health issues, or domestic abuse).
- Is misusing alcohol or other drugs themselves.
- Is at risk of 'honour'-based abuse (such as FGM or Forced Marriage).
- Is a privately fostered child.
  - (Reference: Working Together to Safeguard Children 2023 and KCSIE 2025 paragraph 497)

All staff are aware of the Early Help process and their role in identifying emerging problems. They must discuss their concerns with the Designated Safeguarding Lead (DSL) in the first instance and be prepared to support other agencies in Early Help assessments.

#### 2. Staff Responsibilities and Actions

To effectively identify concerns, recognize vulnerability, and provide support, staff will:

- Create Security: Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Encourage Disclosure: Ensure children know there are trusted adults they can approach if they are worried or have concerns.
- Curriculum Planning: Plan curriculum opportunities for children to develop the skills needed to assess and manage risk appropriately and keep themselves safe.
- Online Safety: Lead and ensure robust arrangements are in place for the effective management and regular monitoring of online safety, including appropriate filtering and monitoring on school devices/networks.
- Training and Vigilance: Attend mandatory training to be alert to the signs of abuse and maintain an attitude of “it could happen here” with regard to safeguarding.
- Record and Report: Record concerns if worried that a child is being abused and report these to the DSL as soon as practical that day. If the DSL is unavailable, a Deputy DSL must be informed.
- Direct Referral: Be prepared to refer directly to Social Care and the Police if there is a risk of significant harm and the DSL or Deputy is not immediately available.
- Allegations: Follow the allegations procedures if a disclosure is made against a staff member.
- Support Vulnerable Pupils: Support pupils in line with their Child Protection Plan, Child in Need Plan, or LAC Care Plan.
- Confidentiality: Treat information confidentially but never promise to “keep a secret,” as this may not be in the child’s best interest.
- Absence Reporting: Notify the DSL or Deputy immediately of any child on a safeguarding plan who has unexplained absence.

### 3. Safeguarding Training

- All staff receive safeguarding and child protection training which is updated every three years, with compulsory annual updates on child protection and safeguarding.
- Jennet Banfield and Siobhan Stevenitt provides safeguarding training, monitors online training (Educare), and ensures staff are kept up-to-date with national changes and guidance via email and termly staff meetings.
- Staff receive an induction checklist, the Child Protection Policy, the employee Code of Conduct, and the DSL role description upon commencing employment.
- Staff are aware of the process for making referrals to Children’s Social Care and their potential role in these assessments.

# Senior Leadership/Management Team Responsibilities

The Senior Leadership/Management Team ensures the strategic implementation and coordination of the safeguarding policy:

- Inter-Agency Working: Contribute to inter-agency working in line with HM Working Together to Safeguard Children 2023 guidance.
- Early Help: Provide a coordinated offer of early help when additional needs of children are identified.
- Staff Training: Ensure all staff, supply staff, and volunteers are alert to the definitions of abuse and indicators through access to regular training opportunities and updates.
- Social Care Liaison: Work with Children's Social Care, supporting their assessment and planning processes, including the attendance at Conference and Core Group meetings and providing reports as required.
- Advice and Support: Provide support and advice on all matters pertaining to safeguarding and child protection to all staff, regardless of position.
- Information Management: Treat any information shared by staff or pupils with respect and follow agreed policies and procedures.
- Allegations Management: Ensure that allegations or concerns against staff, including low-level concerns, are dealt with in accordance with DfE guidance (KCSIE 2025 Part Four, Sections One and Two).

# Professional Duty (Teachers)

The Teachers Standards 2012 (updated December 2021) remind all teachers, Newly Qualified Teachers (NQTs), and Headteachers that they have a professional duty to safeguard children and maintain public trust in the teaching profession.

# Safe Staff and Safe Recruitment

The leadership team at Prime Tutors is committed to the highest standards of safer working practices and recruitment procedures, ensuring the safety of all pupils in line with national and local guidance.

## 1. Recruitment and Vetting Compliance

- Governing Guidance: All safer working practices and recruitment procedures are followed in strict accordance with the guidance set out in KCSIE 2025 Part Three and advised by NCC HR Services policy and practice guidance.
- Essential Checks: We ensure the adoption of all necessary procedures to conduct statutory pre-employment checks and obtain comprehensive references from previous employers as an essential part of the recruitment process. Any concerns that arise will lead to immediate advice-seeking and action in accordance with national guidance.
- Single Central Record (SCR): Prime Tutors maintains a Single Central Record (SCR), which documents all required vetting checks. The SCR is reviewed and updated regularly in accordance with KCSIE 2025 Part Three.
- Training: Leaders, staff, and members of the governing body/trust will receive appropriate training in safer working practices, including accessing the Safer Recruitment Training advised by NCC HR Service or the Trust (e.g., the NSPCC Safe Recruitment online course).

## 2. Staff Conduct and Induction

- Code of Conduct: Staff have access to the Staff Code of Conduct, which clearly defines the boundaries of appropriate professional behaviour. This includes guidance on contact between staff and pupils outside the work context.
- Low-Level Concerns: In line with KCSIE 2025 Part Four, Section Two, our Code of Conduct and the Prime Tutors Safeguarding Policy will explicitly address procedures for low-level concerns from September 1, 2025. Staff can access the Code of Conduct via the Prime Tutors Staff Hub.
- Safeguarding Induction: All newly appointed staff and volunteers will receive an induction on our safer working practices from a trained Designated Safeguarding Lead (DSL) before commencing employment and contact with pupils. All new employees will be inducted to their role using the appropriate Induction Checklist for Safer Recruitment.

## 3. Allegations Procedure and Support

We follow a robust and mandatory procedure for handling all allegations against personnel:

- Immediate Notification: In the event of any complaint or allegation against a member of staff (or the DSL), the Directors will be notified immediately.
- LADO Contact: If an allegation relates to a Director, the Local Authority Designated Officer (LADO) will be informed without delay.
- Robust Response: We will respond to all allegations robustly and appropriately in collaboration with the Local Authority Designated Officer (LADO), LADO Allegation Officers, and HR Business Partner/HR Service.
- Staff Support: All tutors receive information for reporting to the LADO during their induction. Advice and support will be made available to the leadership team by the Safeguarding Children in Education Officer (SCiEO), LADO, and NCC HR/Academy HR Service.

## Links to Other Local Authority Policies

This Child Protection Policy must be read alongside and in conjunction with other relevant policies and statutory guidance regarding the safety and welfare of children. These documents collectively form the suite of policies Prime Tutors has in place to safeguard and promote the welfare of children.

## External Guidance and Reporting Resources

### NSPCC Helpline and Specific Support

Prime Tutors staff are directed to utilize the NSPCC resources for advice and when a direct referral is not immediately required:

- NSPCC Helpline (General): Staff can call the NSPCC helpline for advice and support if they are concerned about a child, or if they need guidance on whether to make a referral to statutory services.
  - Reference: KCSIE 2025 paragraphs 47 and 74 outline the importance of following local multi-agency procedures and the context where external advice (like from the NSPCC) is appropriate.
- Police Guidance: Staff should be aware of the NSPCC's guidance on when to call the Police, particularly in situations requiring immediate protection or intervention.
- Vulnerability Support: Staff should refer to the NSPCC's advice and helplines dedicated to protecting children with Special Educational Needs (SEN) and deaf/disabled children and young people to understand their unique vulnerabilities.
  - Reference: This aligns with the principles in KCSIE 2025, which emphasizes the need for staff to be aware of the specific safeguarding risks faced by vulnerable groups.

## Local Policy and Practice Tools

### Nottinghamshire Safeguarding Children Partnership (NSCP)

Prime Tutors' procedures are integrated with and informed by local authority policy:

- Policy, Procedures, and Practice Guidance: All staff should be familiar with the comprehensive guidance provided by the Nottinghamshire Safeguarding Children Partnership (NSCP).
  - Access Link:  
<https://www.nottinghamshire.gov.uk/nscp/policy-procedures-and-guidance>
- Neglect Toolkit: Staff should utilize the NCC & NSCP Neglect Toolkit (available from the NSCP website) as a key tool for identifying, assessing, and responding to concerns related to child neglect, supporting early help and intervention.

# The Role of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) holds the central and leading responsibility for safeguarding children and child protection at Prime Tutors. Our Senior DSL, Siobhan Stevenitt, is a senior member of the leadership team, ensuring safeguarding is driven from the top. The DSL's role and extensive responsibilities are explicitly detailed in their job description and align with KCSIE 2025 Annex C.

## 1. Core Responsibilities and Management

The DSL ensures that the responsibilities for child protection are fully embedded within the school ethos and that specific duties are discharged effectively.

### A. Managing Referrals and Online Safety

The DSL is the key manager for all safeguarding referrals, including:

- Referral Management: Managing and referring cases of suspected abuse or allegations to the relevant investigating agencies (e.g., Children's Social Care, Police).
- DBS and Risk Referral: Referring cases to the Disclosure and Barring Service (DBS) where a person has been dismissed or left due to risk/harm to a child, as required by law.
- Staff Support: Providing support to staff who make referrals to Children's Social Care and other referral pathways.
- Online Safety Oversight: Ensuring appropriate systems are in place to manage and address online safety, access to mobile phone networks, and specifically referring to concerns linked to the PREVENT Duty where children are at risk of radicalization.

### B. Communication and Year-Round Availability

- Internal Procedure: The DSL ensures a structured reporting procedure is in place and followed by all members of the community in cases of suspected abuse, promoting effective and appropriate communication between all staff.
- Advice Access: Arrangements are guaranteed year-round for all staff and volunteers to seek advice, support, and to inform of safeguarding concerns, incidents, or disclosures.
- Availability: During term time, the Senior DSL (Jennet Banfield) or a Deputy DSL will always be available during working hours to discuss safeguarding concerns. Appropriate cover arrangements, in line with KCSIE 2025 Part Two and Annex C, will be in place year-round for out-of-school activities.

## 2. Inter-Agency Collaboration and Governance

The DSL acts as the primary link between Prime Tutors and external safeguarding agencies:

- Strategy and Inter-Agency Meetings: Attending and contributing to strategy discussions, Child Protection Conferences, Reviews, Core Group Meetings, and other inter-agency meetings. The DSL also supports other staff to attend where appropriate.
- Assessment Contribution: Contributing to the assessment of children by providing and writing reports for conferences and reviews.
- Statutory Guidance: Consulting with the local authority and other agencies in line with HM

Working Together to Safeguard Children 2023 (updated February 2024) and the local Nottinghamshire Safeguarding Children Partnership (NSCP) procedures and practice guidance.

- Headteacher/Principal Consultation: Consulting with the Headteacher/Principal (if the DSL role is not held by the Head) to inform them of any issues and ongoing investigations.

### Allegations Against Staff

- LADO Consultation: The DSL is the primary point of contact for consulting with the LADO (Local Authority Designated Officer) where there are child protection concerns/allegations relating to a member of staff.
- Case Management: Consulting with the 'case manager' (as per KCSIE 2025 Part Four) and the LADO/LADO Allegation Officer where there are concerns about a staff member.

## 3. Training and Policy Development

### A. DSL Training Requirements

Formal DSL training will be undertaken every two years. The DSL is responsible for securing their own training and ensuring all other staff with designated safeguarding responsibilities access up-to-date training. The DSL maintains a register or database to evidence this training.

The required training must enable the DSL to:

- Understand Local Pathways: Have a working knowledge of the NSCP's Pathway to Provision, the Early Help Service, Family Hubs, and the conduct of Child Protection Conferences.
- Vulnerability Awareness: Be alert to the specific needs of children in need, including those with SEN/disabilities and young carers.
- Record-Keeping: Keep detailed, accurate, and secure written records of concerns and referrals.
- PREVENT Duties: Understand the Prevent Duty and reporting requirements for FGM and PREVENT, providing staff advice on protecting children from radicalisation and extremist grooming (KCSIE 2025 Annex A and B).
- Promote Culture: Encourage a culture of protecting children, listening to children, and valuing their wishes and feelings.

### B. Raising Awareness and Policy Review

The DSL must:

- Ensure all staff have access to the Child Protection Policy and are aware of any revisions/updates.
- Ensure that the Child Protection Policy is reviewed annually in consultation with staff, that procedures are regularly updated, and that the governing body is kept informed.
- Ensure the policy is available to parents and carers and uploaded to the organization's website, making them aware that referrals may be made about suspected abuse or neglect.
- Ensure all staff receive a safeguarding induction before working with children.

## 4. Director and Safeguarding File Management

### A. Director Responsibilities

The Director of Prime Tutors ensures overall strategic compliance:

- Policy Adherence: Ensure that policies and procedures, particularly those concerning referrals, are understood and followed by all staff.
- Resource Allocation: Ensure sufficient resources and time are allocated for the DSL and staff to discharge their responsibilities, including participating in strategy discussions and assessments.
- SCR and Oversight: Ensure Senior Leaders have oversight of the Single Central Record (SCR), which is regularly reviewed and compliant with statutory guidance.
- Whistleblowing Culture: Ensure all staff and volunteers feel able to raise concerns about poor or unsafe practice and that these concerns are addressed sensitively in line with whistleblowing policies.
- LADO Referrals: Where an allegation against a staff member meets the criteria for a LADO referral, the Director/SDSL will discuss the allegation immediately with the LADO (within 24 hours), ensuring cases are managed as per KCSIE 2025 Part Four.

## B. Child Protection File Management

The Senior DSL, Siobhan Stevenitt, maintains management oversight of all safeguarding and child protection files.

- Record Maintenance: A record is maintained on the number of children subject to CP, CiN, and LAC concerns, as well as those who have or have had social worker involvement.
- Secure Storage: Prime Tutors uses electronic management systems for learner safeguarding files, managed in accordance with KCSIE 2025 statutory guidance.
- Reporting Protocol: Staff are trained to inform the DSL by phone call when they first raise concerns, followed by completing a CPOMS form on the same working day.
- Transfer of Records: When a child leaves, their confidential safeguarding file (CP, CiN, or confidential file) is transferred securely (password protected) to the confirmed new provider at the same time the child goes on roll, in line with KCSIE 2025.

# Supporting Children with Special Educational Needs (SEN)

## 1. Recognizing Additional Vulnerability

We recognize that children with Special Educational Needs (SEN) and/or disabilities face additional safeguarding challenges both online and offline. Many of these learners access our provision and are particularly vulnerable due to:

- Impaired Capacity to Resist: Their reduced ability to resist or avoid abuse or exploitation.
- Communication Barriers: Speech, language, and communication needs may make it difficult for them to tell others what is happening, especially concerning exploitation or incidents of child-on-child harm, abuse, or sexual harassment.
- Isolation and Bullying: They may be more prone to peer group isolation or bullying (including prejudice-based bullying) and may not always show outward signs of distress.

## 2. Overcoming Barriers in Identification

Our policy reflects the additional barriers that exist when recognizing abuse and neglect in this group, which require staff vigilance:

- Assumption Avoidance: Staff must avoid the assumption that indicators of possible abuse (such as injury, mood changes, or behaviour) relate only to the child's disability without further

exploration.

- Disproportionate Impact: Recognizing that children with SEN/disabilities can be disproportionately impacted by issues like bullying, but may have communication difficulties in disclosing incidents.
- Individualized Behaviour: Addressing individual behaviour concerns by carefully considering the child's specific SEN and disabilities.
- Additional Support: Having robust support in place to teach, advise, mentor, and support children with SEND against harms such as online hoaxes, bullying, grooming, and radicalisation, enabling them to build the confidence to stay safe online, both within and outside the provision.

Staff Requirement: Staff at Prime Tutors must read the SEND Policy, Lone-Working, and Use of Force Policy provided at induction and forward all questions to the DSL/Director.

## Immediate Response to Disclosure

Staff must be prepared to respond to a child's disclosure in a sensitive manner that does not prejudice further enquiries. Staff must maintain a level of confidentiality while consulting with the DSL, but never promise to 'keep a secret' as this may not be in the child's best interest.

### Actions During Disclosure

- Listen Actively: Staff will stay calm and listen with the utmost care to what the child is saying.
- Use Child's Words: Key facts will be established using language the child understands. The child's own words will be used when clarifying or expanding what has been said.
- Questioning: Questions should be open, non-pressurizing, and neither extensive nor repetitive. Leading questions must be avoided; staff must not put words into the child's mouth.
- Reassurance: Staff will reassure the child, affirm that they were right to inform them, and explain that the information must now be passed on to the DSL.
- Record: A full written record must be made immediately, signed and dated, including the time of the conversation and comments on the child's body language. It is inappropriate to ask the child to write or sign a statement about the abuse.

### Action Where Concerns are Identified

Situation	Required Action
Concern Identified	Discuss the concern with the Senior Designated Safeguarding Lead (DSL) to agree on a course of action.
Immediate Danger	A referral must be made immediately to the Multi-Agency Safeguarding Hub (MASH) and/or the Police if the child is at imminent risk of harm. The DSL must be informed of the referral immediately.

### Referral Procedure

- Non-Emergency: Information should be shared with Children's Social Care (MASH or the child's

own social worker) without delay. Children's Social Care will liaise with the Police where required, ensuring an appropriate response.

- MASH Consultation: If unsure about a concern, staff can use the MASH Consultation Phone Line during office hours to speak with a qualified social worker (without naming the child). This is purely an advice line, and no record is made.
- No Staff Investigation: Staff must never attempt to conduct an investigation into suspected child abuse by interviewing the child or others involved, especially if a criminal act is suspected. Investigation is the role of Social Care, the Police, or the NSPCC.

## Information Sharing and Record Keeping

### 1. Confidentiality and Statutory Duty

All matters relating to child protection are confidential. However, the UK GDPR and Data Protection Act must not be a barrier to sharing information where failure to do so would result in a child being placed at risk of harm (KCSIE 2025 paragraph 55).

- Need-to-Know: The DSL will disclose personal information about a pupil to other members of staff only on a 'need to know' basis.
- Information Sharing Principles: We adopt the statutory information sharing principles detailed in:
  - KCSIE 2025 paragraphs 114 to 122 and Annex C.
  - HM Working Together to Safeguard Children 2023 (paragraphs 28-34).

### 2. Documentation Standards and Security

Meticulous recording is crucial, as highlighted by Rapid Reviews, where missed opportunities to record and share information can have severe consequences.

- Timely Recording: Any concern must be recorded in writing within 24 hours using a factual, evidence-based account. Records must be signed, dated, and where appropriate, witnessed.
- Chronology: A chronology (log of activity) will be kept for every child. Pastoral staff will record minor concerns on the chronology and alert the DSL if concerns escalate.
- Body Maps: Body maps will be used to support clarity, such as noting the location of injuries or marks. Staff must never take photographic evidence of injuries or marks to a child, as this could lead to managing allegations procedures against the staff member.

### 3. Safeguarding File Management

Prime Tutors uses electronic management systems (e.g., Google Forms/CPOMS) to maintain records.

- Separate Secure File: Safeguarding, child protection, and welfare concerns are kept in a separate secure electronic file known as the 'confidential safeguarding or child protection' file, away from the main pupil file.
  - The main pupil file will have a red indicator (e.g., a 'C' in the top right-hand corner) to denote the existence of a separate confidential file.
- File Commencement: A confidential file should be commenced in the event of: a referral to MASH/Social Care; multiple minor concerns; or if the child is open to Social Care or Early Help Services.
- File Content: Files must contain a front sheet, a chronology, a detailed record of concern (including body map where appropriate), and a record of concerns shared by others.
- DSL Oversight: The DSL is responsible for file maintenance, ensuring a secure log summarises concerns and actions taken (Safeguarding Log via CPOMS) to give an overview of the learner's

journey through the safeguarding system.

#### 4. Transfer of Records (Statutory Requirement)

- Secure Transfer: We adopt the file transfer arrangements contained in KCSIE 2025. When a child moves educational provision, their confidential safeguarding file (CP, CiN, or LAC file) is sent securely (password protected) to the new setting when the child starts/leaves.
- Timeliness: For children subject to social care involvement, the file transfer must occur within 5 days as required by KCSIE 2025.
- Liaison: Our DSL will liaise directly with the receiving provider to share important information, ensuring the child remains safeguarded and that any 'reasonable adjustments' are put in place for a smooth integration.
- Cohort Data: Information on cohorts of children who have been open to social care will be maintained and considered for sharing 'if appropriate' with the new provider in advance.

### Educating Young People (RSHE and Online Safety)

#### 1. Integrated Safety Education (KCSIE 2025)

We provide age-appropriate education to equip children with the skills, attributes, and knowledge to navigate risks, including:

- Online and Digital Risks: Covering online safety, remote learning, filters and monitoring, youth-produced imagery, cyber-crime, and the use of mobile technology.
- Curriculum Approach: This is taught as part of the wider RSHE programme and integrated into other subject areas.

#### 2. Whole-School and Mobile Phone Approach

- Whole-School Approach: We ensure a whole-school approach that promotes sensitive discussion and the confidence to seek support from adults should children encounter online harms, hoaxes, harassment, or incidents of sexual violence/harassment.
- Mobile Technology Risk: We carefully manage mobile phone use, recognizing that children with unlimited access to mobile networks (3G, 4G, 5G) may be vulnerable to exploitation or bullying. We use educational opportunities to raise awareness of these risks and share information with parents/carers.
- Staff Adherence: All tutors are required to integrate PSHE into each session, focusing on e-safety and appropriate online use, and must adhere to the Prime Tutors E-Safety Policy.
- Home Visit: During induction, parents are informed of resources available for online safety, and for learners accessing home education, sessions are conducted with a supervising parent present to ensure safety and monitor material appropriateness.

### Helplines and External Reporting Channels

This section provides essential contact information for both children and adults to seek confidential advice, report concerns, or access mental health crisis support outside of Prime Tutors.

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#### For Children and Young People

Service	Purpose	Contact Details
Childline	Confidential counselling and support for anything worrying a child, available 24 hours a day.	0800 11 11
Childline Online Chat	Direct, one-to-one confidential chat with a counsellor.	<a href="#">Childline 1-2-1 Counsellor Chat</a>

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#### For Staff, Parents, and Carers (Whistleblowing & Advice)

Service	Purpose	Contact Details
NSPCC Helpline	Advice and support for parents, carers, and staff who are concerned about a child, or if a concern raised with an employer is not being addressed (whistleblowing).	0800 028 028 0295  Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

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#### Emergency and Non-Emergency Services

Service	Purpose	Contact Details
Police (Emergency)	Immediate risk of serious harm, crime in progress, or life-threatening emergency.	999
Police (Non-Emergency)	Non-urgent incidents, reporting crime not in progress, or general police enquiries.	101

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#### Mental Health Support and Crisis Lines

Service	Purpose	Contact Details

Mental Health Crisis Line (Nottinghamshire Healthcare NHS Foundation Trust)	Urgent support and advice for mental health crises.	0808 196 3779
Mind	Mental health information and signposting.	0300 123 3393  Website: <a href="#">Mind</a>
Young Minds	Support for children and young people's mental health.	Website: <a href="#">Young Minds</a>
Nottinghamshire Healthcare NHS Foundation Trust	General contact for NHS services in Nottinghamshire.	0808 196 3779