



HARRISON ALLEN SAFEGUARDING AND CHILD PROTECTION POLICY

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This policy is reviewed regularly and, in any event, annually.

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A. AIMS OF THIS POLICY

- To raise awareness of all tutors of the need to safeguard all students and of their responsibilities in identifying and reporting concerns in relation to any student to the Designated Safeguarding Lead or her deputy.
- To emphasise the need for good communication between Harrison Allen staff and tutors in matters relating to child protection.
- To have a structured procedure for dealing with issues arising.
- To support all students' development in ways that will foster security, confidence and independence.
- To promote safe practice.
- To develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of students.
- To ensure that all tutors registered with Harrison Allen have been checked as to their suitability to work with children.
- To take account of and inform policy in related areas, such as anti-bullying; discipline and behaviour; health and safety; on-line safety; peer to peer abuse; procedures for dealing with allegations against tutors and staff and recruitment practice
- To ensure all tutors have read and understood the latest version of Keeping Children Safe in Education.

B. SAFEGUARDING INFORMATION FOR ALL TUTORS AND STAFF - WHAT TUTORS AND STAFF SHOULD KNOW

A child centered and coordinated approach to safeguarding

1. Our tutors and staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children.
2. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, we ensure our approach is child-centered. This means that we consider, at all times, what is in the best interests of the child.
3. No single person can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this Policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, inside or outside the home, including online;
- 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; and
- taking action to enable all children to have the best outcomes.

NB. Children includes everyone under the age of 18.

The role of tutors, Harrison Allen and Harrison Allen staff

5. Tutors are particularly important, as they are in a position to identify concerns early, provide help for children, promote children’s welfare and prevent concerns from escalating.

6. All tutors and staff have a responsibility to provide a safe environment in which children can learn.

7. All tutors and staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years.

8. Any tutor or staff member who has any concerns about a child’s welfare should follow the processes set out under Procedures below. Tutors and staff should expect to support social workers and other agencies following any referral.

9. Harrison Allen has a Designated Safeguarding Lead (Karen Abbott – her deputy is Susi Wood) who provides support to tutors and staff to carry out their safeguarding duties and who will liaise closely with other services such as the relevant Local Authority referrer.

10. The Designated Safeguarding Lead (and her deputy) is the most appropriate person to advise in response to a tutor’s safeguarding concern.

What tutors and staff need to know

11. All tutors and staff should be aware of the procedures which support safeguarding and these are explained to them as part of tutors and staff induction. This includes:

- This Safeguarding and Child Protection Policy, which amongst other things also includes the policy and procedures to deal with child-on-child abuse;

- Our Behaviour and Attendance Policy (which includes measures to prevent bullying, including cyberbullying, child on child abuse, prejudice-based and discriminatory bullying);
- Our Behaviour Code for tutors' and students' behaviour;
- Details of safeguarding response to children who go missing from education; and
- Details of the role of the Designated Safeguarding Lead (including the identity of and contact information for the Designated Safeguarding Lead and her deputy).

Access to the relevant policies and Part one of KCSIE is provided to all tutors and staff at induction.

12. All staff receive appropriate safeguarding and child protection training (including online safety and Prevent training) at induction. The training is regularly updated. In addition, all staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Following an appropriate induction process, tutors are responsible for keeping themselves up-to-date on Safeguarding and child protection matters although Harrison Allen offers opportunities for such training and provides access for the tutors to all relevant policies with their attention drawn to any government guidance amendments.

13. All tutors and staff are aware of the Early Help process and understand their role in it.

14. The Designated Safeguarding Lead and her deputy are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

15. All tutors and staff know what to do if a child tells them he/she is being abused, exploited or neglected. Tutors and staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or her deputy). Tutors and staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

16. All tutors and staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. **All tutors and staff should be aware that children may not feel ready or know how to tell someone that they**

are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

What tutors and staff should look out for

Early Help - Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage in a child or young person's life.

17. Any child may benefit from Early Help, but all tutors and staff should be particularly alert to the potential need for Early Help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child.

Abuse, neglect and exploitation

18. All tutors and staff need to be aware of indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the educational setting, inside and outside of the home, and on-line. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation (see paragraphs 23 - 27 below), and specific safeguarding issues such as child criminal exploitation and child sexual exploitation (see paragraphs 29-35 below) so that tutors and staff are able to identify cases of children who may be in need of help or protection.

19. All tutors and staff with any concerns should always speak to the Designated Safeguarding Lead, or deputy.

20. All tutors and staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore, tutors and staff should always be vigilant and always raise any concerns (however seemingly minor or insignificant) with their Designated Safeguarding Lead (or deputy).

21. All tutors and staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the educational environment and/or can occur between children outside of these environments. All tutors and staff, but especially the Designated Safeguarding Lead (and deputy) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

22. All tutors and staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Indicators of abuse, neglect and exploitation

23. Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse

including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

24. Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

25. Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

26. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all tutors and staff should be aware of it and of relevant policies and procedures for dealing with it.

27. Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and

shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

C. SAFEGUARDING ISSUES

28. All tutors and staff should have an awareness of safeguarding issues that can put children at risk of harm. Annex B of KCSIE contains important additional information about specific forms of abuse and safeguarding issues and must be read by all staff and tutors. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalization and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as youth produced sexual imagery) can be signs that children are at risk. Behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger and safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Children with SEN and disabilities may be more prone to peer group isolation than other children. Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

29. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

30. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

31. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes

themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

32. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in Annex B to KCSIE.

Child Sexual Exploitation (CSE)

33. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

34. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

35. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g.; they believe they are in a genuine romantic relationship.

Further information about CSE including definitions and indicators is included in Annex B to KCSIE.

Female Genital Mutilation (FGM)

36. All tutors and staff should, with regard to any concerns about female genital mutilation (FGM), note the mandatory reporting duty for FGM which requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in under 18-year-olds to the police (directly) themselves as well as informing the DSL.

See <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Domestic Abuse

37. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Mental Health

38. All tutors and staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

39. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Tutors, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

40. Where children have suffered abuse, neglect, exploitation or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that tutors and staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

41. Tutors can access a range of advice to help them identify children in need of extra mental health support and more information can be found in the Mental Health and Behaviour in Schools guidance (see gov.uk). **All concerns should be raised immediately with the Designated Safeguarding Lead or her deputy.**

Child on child abuse (previously peer on peer)

42. All tutors and staff should be aware that children can abuse other children (often referred to as child on child abuse) and that it can happen both inside and outside of school or college or the educational environment and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

43. It is essential that all tutors and staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

44. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and on-line sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

45. All tutors and staff must follow Harrison Allen's procedures with regards to child on child abuse which require any concerns to be reported immediately to the Designated Safeguarding Lead or her deputy.

Serious violence

46. All tutors and staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

47. All tutors and staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently

absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Additional Information about abuse, neglect and exploitation and specific forms of abuse and online safety

48. All tutors have been provided with a document What to Do if You Are Worried a Child is Being Abused. The NSPCC website also provides useful additional information on abuse, neglect and exploitation and what to look out for.. Annex B of KCSIE contains important additional information about specific forms of abuse and safeguarding issues. Tutors and staff who work directly with children should read the annex.

49. **Online safety and generative AI** - It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues on online safety (also see Anti-Bullying, Cyber-Bullying & Online safety/Acceptable Use Policy) is considerable with four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Tutors will be aware that some children sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Any concerns must be reported immediately to the DSL or her deputy.

Our Anti-Bullying, Cyber-Bullying & Online safety/Acceptable Use Policy sets out that Mobile phones are required to be switched off during lessons. We do not provide pupil IT access. For remote tuition, a responsible adult must always be present throughout lessons.

As generative AI is used widely, tutors must be alert to potential safeguarding issues in this regard and any concerns reported promptly to the DSL.

D. WHAT TUTORS AND STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT A CHILD

50. Tutors and staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, tutors and staff should always act in the best interests of the child.

51. If tutors or staff have any concerns about a child's welfare, they should act on them immediately and contact the Designated Safeguarding Lead (or deputy). This includes low-level concerns (being any behaviour which does not meet the harm threshold but is inconsistent with our expectations on behaviour). The Designated Safeguarding Lead will record concerns securely, review them for patterns and escalate as appropriate including to and liaison with the relevant Local Authority referrer.

52. The Designated Safeguarding Lead or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the Designated Safeguarding Lead (or deputy) is not available, this should not delay appropriate action being taken. Tutors or staff should consider speaking to the police. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or deputy) as soon as is practically possible.

53. Tutors and staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a Child in Need or a child with a protection plan).

54. The **seven golden rules** on sharing information (HM Gov non statutory Information Sharing Guidance July 2018) should be followed:

1. Remember that the General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the UK GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure:** ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

55. We recognise that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

E. EARLY HELP

56. When a safeguarding concern is raised by a tutor and communicated to the Designated Safeguarding Lead (or deputy) the Designated Safeguarding Lead will contact the Local Authority client and, if requested to do so, will assist with liaison with other agencies and provide assistance to any inter-agency assessment as appropriate. Tutors and staff may be asked by the client to support other agencies and professionals including in an Early Help assessment. Any such cases should be kept under constant review.

57. Safeguarding incidents and/or behaviours can be associated with factors outside the educational environment and/or can occur between children outside that educational environment. We, especially the Designated Safeguarding Lead (and deputies), consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or

welfare. This contextualised approach is especially important for more vulnerable children, victims of abuse and SEND children.

58. We are aware that to provide as much information as possible is helpful as part of the safeguarding referral process and therefore encourage our tutors to be comprehensive in the provision of background information available to them. This will allow any assessment to consider all the available evidence and the full context of any abuse.

F. CHILDREN IN NEED

59. A Child in Need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

G. CHILDREN SUFFERING OR LIKELY TO SUFFER SIGNIFICANT HARM

60. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect, exploitation, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

H. WHAT WILL THE LOCAL AUTHORITY DO? Please also see the latest KCSIE.

61. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services this could be an Early Help Assessment;

- the child is in need and should be assessed under section 17 of the Children Act 1989. Chapter one of Working Together to Safeguard Children provides details of the assessment process;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Chapter one of Working Together to Safeguard Children provides details of the assessment process; and
- further specialist assessments are required to help the local authority to decide what further action to take this could be an Early Help Assessment.

62. If social workers decide to carry out a statutory assessment, tutors and staff should do everything they can to support that assessment (supported by the Designated Safeguarding Lead (or deputy) as required).

I. PARTICULARLY VULNERABLE CHILDREN

63. Whilst all children should be protected, it is important to recognise (and reflect in our policies and procedures) that some groups of children are potentially at greater risk of harm:

- The cohort of children in Alternative Provision often have complex needs and it is important that tutors are aware of the additional risk of harm that these students may be vulnerable to;
- Children who need a social worker (Child in Need and Child Protection Plans). Local Authorities share the fact a child has a social worker with Harrison Allen, and the Designated Safeguarding Lead holds and uses this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes;
- Children absent/missing from education. Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. Tutors are aware of the need to report absences expeditiously to the Designated Safeguarding Lead;
- Elective Home Education (EHE). Home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs;
- Children requiring mental health support. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation;
- Looked after children and previously looked after children. The most common reason for children becoming looked after is as a result of abuse and/or neglect. A previously looked after child potentially remains vulnerable. Harrison Allen should have information about the child's care arrangements and the levels of authority delegated

to the carer by the authority looking after him/her. The Designated Safeguarding Lead should have contact details of the child's social worker and the name of the virtual school head in the authority who looks after the child

- Children with Special Educational Needs and Disabilities (SEND) or physical health issues. Children SEND or certain health conditions can face additional safeguarding challenges. This safeguarding and child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
 - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
 - communication barriers and difficulties in managing or reporting these challenges, in particular that children with SEND may have difficulty in expressing themselves on these issues.
- Children who are lesbian, gay, bi, trans or gender questioning (LGBTQ+) - Children who are lesbian, gay, bi, or trans (LGBTQ+) can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder. Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that tutors endeavour to reduce the additional barriers faced and create a culture where children can speak out or share their concerns. Further Government Guidance Is expected in this area.

J. RECORD KEEPING

64. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing in accordance with the procedures in this Policy (see below as to our Procedures). Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. We recognise

that matters related to Safeguarding and Child Protection are of a confidential nature. Harrison Allen office staff therefore share detailed information about a student with tutors on a need-to-know basis only.

K. SAFER RECRUITMENT

- Harrison Allen operates a safer recruitment policy to ensure that all tutors and office staff are qualified and suitable as far as can be reasonably ascertained.
- All tutors and members of office staff are interviewed in person by Pippa Harris, the Tutor Manager of Harrison Allen, who undertakes Safer Recruitment training as required. The Safer Recruitment Policy for Harrison Allen is regularly reviewed by Pippa Harris. On-line searches are considered as part of our due diligence checks on candidates.
- At interview, the identity of a potential tutor or member of staff is verified with sight of originals of current photographic ID (usually a passport or driving licence) and recent proof of address. We also ask to see originals of their relevant professional qualification certificates or provide other proof of the same
- Appropriate checks (ie enhanced DBS checks) are required for all potential tutors and office staff. We insist on seeing the original EDBS and we note the date when the original was inspected. We have a rigorous system of checking the need for renewals of EDBS. Where possible we encourage the use of the DBS update service by prospective tutors.
- We do not accept references provided directly by prospective tutors or members of staff and we always take up references ourselves.
- At interview candidates are asked to account for any gaps in their employment history and by interviewing the tutor or member of staff at length we seek to assess their mental and physical fitness to carry out their work responsibilities.
- We verify the candidate's right to work in the UK and if the prospective tutor or member of staff has lived or worked outside of the UK then we make such further checks as we deem appropriate (such as contacting foreign employers).

- We have a standard checklist for the interview process which is attached to the tutor's profile on our password secured Information Management system. The interview process includes safeguarding questions to verify the individual's level of knowledge on safeguarding issues.
- We maintain a Single Central Register of staff and tutors registered with us with active profiles.

L. OTHER RELATED POLICIES/INFORMATION

This policy has clear links to other policies, in particular to Anti-bullying etc Policy, Behaviour & Attendance Policy, Equality etc Policy, Health and Safety Policy, Safer Recruitment Policy, SMSC Policy, Social Inclusion Policy and Whistle Blowing Policy. Each of these policies is also concerned with the protection of all children from various kinds of harm and all are available on our website.

Important GOV.UK guidance which you must read and with which you need to be familiar:

Keeping Children Safe In Education – latest version September 2025

Working Together To Safeguard Children – December 2023 and any updates

M. PROCEDURES

- All tutors have confirmed in writing that they have read our Safeguarding and Child Protection Policy (which draws the tutors' attention to the latest version of Keeping Children Safe in Education currently September 2025) and understand their responsibilities in passing concerns without delay to the Harrison Allen office.
- They are provided with Key Information enforcing important Safeguarding matters including contact details for the Designated Safeguarding Lead and her deputy.
- All tutors know how to respond to a child who discloses abuse and the need to liaise with the Designated Safeguarding Lead on any issue of concern (including child on child abuse).
- **The Designated Safeguarding Lead is Karen Abbott to whom all concern/disclosures/allegations will be referred. In her absence the responsibility will be assumed by Susi Wood. There is a written role description for these roles. We have**

due regard to the Prevent duty as appropriate. If for any reason it is felt that a referral to individuals at Harrison Allen is inappropriate or not viable then a referral can be made direct to the relevant Local Authority Designated Officer (LADO):

Wandsworth

The LADO for Wandsworth is Anita Gibbons

LADO@wandsworth.gov.uk

07974 586461

Interim LADO Alice Peatling alice.peatling@richmondandwandsworth.gov.uk

Merton

The LADO for Merton is John Shelley

lado@merton.gov.uk or securely: lado@merton.gov.uk.cjism.net

0208 545 3187 or 07814 642 728

LADO Business support: Jody Louis 0208 545 3179

Alternatively, you can google search for contact information for LADOs in any borough.

- The Designated Safeguarding Lead and her Deputy are fully trained in the roles and training is updated regularly.
- The purpose of having two named and nominated people is to cover the eventuality that an allegation might be brought against either of the nominated people.
- Harrison Allen needs to be alerted to 'no shows' or cancellations by parents/carers in accordance with the Protocol set out below and contact needs to be made to Harrison Allen IMMEDIATELY by telephone if anything concerns you or goes awry.
- **Non-attendance and safeguarding protocol:**

In the first instance, if a student fails to show at the start of a lesson, tutor needs to contact carer/parent (contact information on referral form which is shared with tutors at outset on the Management system) and seek to establish why student is absent.

If an absence is unexplained or an absence of concern or, for any concern of a safeguarding nature, tutor will telephone or e-mail Harrison Allen immediately and follow up in writing in this standard format:

- Name of student
- Name of tutor
- Date and time of writing report
- Tuition venue
- If Safeguarding Concern - nature of the concern
- If Absence Concern - actions taken - contacts made, to whom and at what time, to identify student's whereabouts.

This format is in the e-mail signature for Karen Abbott, the Designated Safeguarding Lead (DSL), for easy access for tutors to copy and paste into their e-mail to Harrison Allen.

As appropriate, Harrison Allen will then use this format to inform referrer and to consider appropriate escalation routes (eg to MASH, Police, Prevent/Channel and the national referral form).

As usual, a report also needs to be put onto TutorCruncher management system.

The standard format report sent to Harrison Allen by tutors will be filed in a folder at Harrison Allen 'Safeguarding Reports' accessible to both the Designated Safeguarding Lead and the Deputy DSL.

- Written records are kept of all concerns, whether or not there is a need to refer the matter immediately, and these records are kept securely. These records include the rationale for any decisions made.
- The tutors are aware that there should always be a responsible third party (over 18) present when tuition is taking place. This applies equally if the lesson is being conducted remotely.
- It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our Anti-bullying, Cyber bullying, and E-safety/Acceptable Use Policy is an integral part of safeguarding.
- Local Authorities must provide us with two emergency contact numbers and processes are in place to identify persistent or unexplained absences.
- A tutor should never offer a student a lift in a car. Tutors should only by special exception have a child's personal e-mail address or telephone number as contact should be through the parent/carer. No tutor is permitted to engage with students other than for tuition purposes nor must they agree to be in contact on any form of social media.
- In home tuition situations parents/carers are advised by Harrison Allen that they must always remain present during lessons. This is also a requirement for any remote learning.
- We have procedures at Harrison Allen's offices for secure access with procedures to identity check all visitors
- Up-to-date information on LADO and IPOC/MASH/safeguarding partnerships and relevant details are maintained in the Safeguarding file

- We and our tutors provide an environment in which all students, including those with SEN, can feel confident and able to discuss their concerns and have access to the Designated Safeguarding Lead.
- Where teaching is on site at Harrison Allen, we foster an atmosphere of friendliness and openness and we encourage the students to chat on arrival and they are given ample opportunity to raise any issues confidentially. We believe that the informal environment is conducive to free exchange of concerns.
- We provide our tutors with specific guidance as to online safety and remote learning given the potential risks to children of harmful and inappropriate online material.

N. DEALING WITH DISCLOSURES – guidance for tutors

Preparation:

All tutors must take time to read this Policy and Keeping Children Safe in Education September 2025 and subsequent updates

All tutors have been given the document ‘What to do if a Disclosure of abuse is made or you are concerned about a student’

All tutors must think about what they might say or do should a disclosure be made to them

What should you do if a student starts to talk about/disclose child protection matters?

- Do not promise confidentiality – you may need to refer matters onto another party. Explain what will need to happen and why.
- Listen carefully to what the student is saying without interrupting.
- Keep an open mind about what you are told.
- Do not pre-judge or make assumptions as to the veracity of what you are being told. Believe the student, even if you cannot see any injury which would support what is being said.
- Do not ask leading questions or ask more questions than you have to – just establish what the student is telling you. Use TED - ‘Tell me what happened’; ‘Explain to me’ and ‘Describe to me’ and explore timescales (‘When did this happen’ or ‘When did this last happen’).
- Record the information carefully (see below), using the student’s own words.

- One reason for immediate referral to Harrison Allen is that consideration may be needed in respect of possible forensic evidence for which the window is only 72 hours.
- In an emergency, call the POLICE.

Next steps - Tutors should

1. The tutor will need to telephone and speak immediately to our Designated Safeguarding Lead, Karen Abbott (or Susi Wood in Karen Abbott's absence) to pass on the concern or details of the incident and to identify the student's full name.
2. The tutor will need to follow up the telephone conversation to Harrison Allen with a written report of the concern or incident. This should be sent by secure e-mail immediately to the Designated Safeguarding Lead (Karen Abbott at karen@harrisonallen.co.uk) or in her absence to the Deputy Safeguarding Lead (Susi Wood at accounts@harrisonallen.co.uk) and keep your original notes safe.
3. Tutors should then await further instructions from Harrison Allen.
4. Throughout, keep a comprehensive note of dates and times.

Please note that, for easy access to relevant phone numbers, on every e-mail from Harrison Allen there is, in the e-mail signature, a tutor guide for Safeguarding concerns.

Next steps - The Designated Safeguarding Lead (or Deputy) will:

1. Initially, phone the department who referred the student for tuition to report the incident.
2. Follow up telephone conversation with a written report of the incident by e-mail.
3. Keep a written record of all conversations with dates and times.
4. If further action is required, we follow the instructions from the referring department including as necessary giving support to and liaising with the multi-agency safeguarding bodies put in place by the safeguarding partners (the local authority; Integrated Care Systems' (ICs) (previously known as clinical commissioning group)
5. Thereafter, Harrison Allen will follow up seeking confirmation of any further action taken and the outcome.

What staff or tutors should do if they have safeguarding concerns about another tutor or Harrison Allen staff member.

The procedure to be followed to manage any safeguarding concerns about another tutor or staff member (whether low-level concern or an allegation meeting the harm threshold) is as follows:

- if relating to another tutor, the matter should be referred to the Designated Safeguarding Lead or her deputy who, as appropriate, will consult with the Local Authority client and/or LADO without delay, decide on relevant actions, manage records and consider referrals to eg DBS;
- if relating to the Designated Safeguarding Lead, the matter needs to be referred to her Deputy (and vice versa) or the matter could be referred directly to the Local Authority LADO (see contact details above)

What tutors or staff should do if they have concerns about safeguarding practices within Harrison Allen.

All tutors and staff should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. Please see the Harrison Allen Whistle Blowing Policy.