Safeguarding and Child Protection Policy 2026–2027

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Statutory Framework

- This policy has been developed in accordance with the following statutory guidance and legislation:
    - Keeping Children Safe in Education (DfE, September 2026)
    - Working Together to Safeguard Children 2026
    - Children Act 1989 and 2004
    - Education Act 2002
    - Human Rights Act 1998
    - Equality Act 2010
    - Data Protection Act 2018 and UK GDPR
    - The Prevent Duty Guidance
    - Working Together to Improve School Attendance (2026)
    - Alternative Provision Statutory Guidance
    - SEND Code of Practice (2015)
    - Children and Social Work Act 2017
    - Prevent duty guidance: England and Wales (2023).
    - Generative artificial intelligence (AI) in education.
    - Early years foundation stage (EYFS) statutory framework.

Policy Consultation and Review

This policy is reviewed annually by the Leadership Team and will also be reviewed following any significant safeguarding incident, legislative change, learning from safeguarding practice reviews or changes to organisational arrangements.

Swindon Tuition Centre recognises the expertise that staff develop through safeguarding practice and actively encourages feedback from employees, learners, parents, carers, commissioners and partner agencies to support continuous improvement.

The Leadership Team will also review safeguarding themes, audits, incidents, complaints, learning from practice reviews and feedback from stakeholders to support continuous organisational learning and improvement.

This policy is published on the Swindon Tuition Centre website and is available on request.

All staff receive this policy during induction together with:

- Staff Code of Conduct
- Staff and Student Phone Policy
- Behaviour Policy
- Staff Behaviour Policy
- Whistleblowing Policy
- Low-Level Concerns Policy
- Keeping Children Safe in Education 2026 – Part One
- Managing Allegations and Concerns About Adults Policy

This policy should be read alongside STC's wider safeguarding, people and governance policies.

Policy name	Policy Owner	Operational Lead	Approved By	Date	Review date
Safeguarding and Child Protection Policy	Director of Strategy	Designated Safeguarding Lead	Leadership Team	27.07.26	01.09.27

Policy Updates

Review date	Update Summary	Reviewed by	Next Review
01.09.2025	Annual review to reflect KCSIE 2025	DSL	01.09.2026
04.09.2026	Whole policy review to reflect KCSIE 2026, updated organisational structure, strengthened governance, clarified safeguarding responsibilities, aligned with updated STC policies and improved overall policy consistency.	Director of Strategy and DSL	04.09.2027

Safeguarding Team

Swindon Tuition Centre maintains a Designated Safeguarding Lead (DSL) supported by a team of appropriately trained Deputy Designated Safeguarding Leads (DDSLs).

The current safeguarding team and contact details are maintained separately within the Safeguarding Contacts Directory, which is reviewed whenever staffing changes occur.

Where this policy refers to the Designated Safeguarding Lead (DSL), this includes the DSL or an appropriately trained Deputy DSL acting on their behalf.

The Safeguarding Contacts Directory is reviewed immediately following any staffing changes to ensure current contact details are always available to staff, learners and external agencies.

Safeguarding Governance

Swindon Tuition Centre recognises that safeguarding is fundamental to every aspect of its provision. The Leadership Team is responsible for ensuring effective safeguarding governance, while the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads provide operational leadership. All staff, volunteers, agency workers and contractors share responsibility for safeguarding and promoting the welfare of children and are expected to act in accordance with this policy, statutory

guidance and the organisation's safeguarding procedures.

Definitions

Safeguarding

Safeguarding is the action taken to promote the welfare of children and protect them from harm. It includes 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, taking action to enable all children to have the best outcomes, and protecting them from maltreatment.

Child Protection

Child protection forms part of safeguarding and refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Family Help

Swindon Tuition Centre recognises the importance of identifying need early and providing support before concerns escalate.

Family Help is the coordinated support provided to children and families as soon as needs emerge. This includes universal services, targeted early help and partnership working with local authority services to improve outcomes and reduce the likelihood of statutory intervention.

Staff should understand the different levels of need and seek advice from the DSL or DDSL whenever they believe a child or family may benefit from Family Help. Where appropriate, STC will contribute to Family Help assessments and work collaboratively with safeguarding partners to support children and families.

Contextual Safeguarding

Contextual safeguarding recognises that children may experience abuse and exploitation beyond their family environment, including within peer groups, schools, online, neighbourhoods and the wider community.

Prejudice-Based Harm, Racism and Faith-Targeted Abuse

In line with Keeping Children Safe in Education (KCSIE) 2026, Swindon Tuition Centre recognises that prejudice-based harm is a safeguarding concern. Children and young people may experience harm as a result of racism, faith-based prejudice, or other forms of discriminatory behaviour, and these experiences can have a significant impact on their welfare, wellbeing, mental health, sense of safety, and willingness to seek help.

All staff have a responsibility to remain alert to the signs and impact of prejudice-based harm, respond promptly to concerns, and report incidents in accordance with STC’s safeguarding procedures. Where appropriate, incidents of racism, faith-targeted abuse, and other discriminatory behaviour will be treated as safeguarding concerns, recorded on CPOMS, and considered alongside any wider risks to the child.
Swindon Tuition Centre is committed to promoting an inclusive, respectful and anti-discriminatory culture in which all students feel safe, valued and protected from harm.

Child-Centred Practice

Child centred practice means that the needs, wishes, feelings and best interests of the child are placed at the centre of all safeguarding decisions. Staff should always consider what is in the child's best interests. Designated Safeguarding Lead (DSL)

The DSL is the appropriately trained senior member of staff with lead responsibility for safeguarding and child protection across Swindon Tuition Centre. The DSL provides advice, support and guidance to staff, coordinates safeguarding activity and works with external agencies to safeguard children.

Deputy Designated Safeguarding Leads (DDSLs)

DDSLs are appropriately trained members of staff who support the DSL and carry out safeguarding responsibilities in the DSL's absence or as delegated.

Low-Level Concerns

A low level concern is any concern, no matter how small, that an adult working in or on behalf of the organisation may have acted in a way that is inconsistent with the Staff Code of Conduct, including behaviour that does not meet the threshold for harm but may indicate that professional boundaries require attention.

Abuse

Abuse is 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. Abuse may occur within a family, institutional or community setting, by those known to the child or by others, including online.

Harm

Harm means ill-treatment or impairment of a child's physical, emotional, intellectual or behavioural development or health, including impairment suffered through seeing or hearing the ill-treatment of another.

Vulnerable Learner

A vulnerable learner is any child whose circumstances may increase their risk of abuse, neglect or exploitation, including children with special educational needs and disabilities (SEND), children in alternative provision, children with social workers, looked after children, previously looked after children, young carers and children experiencing mental health, family or environmental challenges.

Mental Health

Mental health concerns may, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. While only appropriately trained professionals should make mental health diagnoses, all staff should be alert to behaviours that may suggest a learner requires additional support or safeguarding intervention.

Safeguarding Team

Safeguarding Team refers collectively to the Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSLs) and any other appropriately trained staff with delegated safeguarding responsibilities.

Safeguarding Partners

Safeguarding Partners are the organisations responsible for safeguarding arrangements within the local area, including the Local Authority, Integrated Care Board and Police, who work together to safeguard and promote the welfare of children.

Introduction

Purpose

Swindon Tuition Centre (STC) is committed to safeguarding and promoting the welfare of every child and young person and expects all staff, volunteers, agency workers, contractors and visitors to share

this commitment.

Safeguarding is fundamental to every aspect of our organisation and underpins all

decision-making, practice and relationships. We believe that every child has the right to feel safe, be heard, achieve positive outcomes and receive the support they need to thrive regardless of their background, circumstances or individual needs.

As an alternative provision, Swindon Tuition Centre recognises that many of the learners we support have experienced adversity, trauma, disrupted education or other vulnerabilities. We are committed to providing a safe, inclusive and nurturing environment where children feel respected, valued and protected from harm.

This policy outlines the safeguarding arrangements that apply across all Swindon Tuition Centre provisions, including centre-based learning, community tuition, outdoor learning and any other education delivered on behalf of the organisation.

Our Safeguarding Principles

Swindon Tuition Centre is committed to ensuring that safeguarding is embedded throughout every aspect of the organisation. Our safeguarding practice is underpinned by the following principles:

- The welfare of the child is paramount.
- Every child has the right to feel safe, heard and respected.
- Safeguarding is everyone's responsibility.
- Decisions will always be child-centred and made in the child's best interests. •

Early identification and intervention improve outcomes for children.

- Effective safeguarding relies upon professional curiosity, respectful challenge, evidence-informed decision making and effective multi-agency working.
- Staff are expected to maintain professional boundaries and act in accordance with the Staff Code of Conduct.
- Safeguarding arrangements will be regularly reviewed to support continuous improvement and organisational learning.
- The wishes, feelings and lived experiences of children will be sought, listened to and appropriately considered when making safeguarding decisions.

Safeguarding Decision-Making

When making safeguarding decisions, Swindon Tuition Centre will always consider:

- the best interests of the child;
- the child's wishes and lived experience;
- the level of actual or potential risk;
- the need for timely intervention;
- proportionality;
- professional judgement;
- available evidence;
- advice from safeguarding partners where appropriate.

Where there is uncertainty, staff should always seek advice from the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

Scope

This policy applies to:

- all employees;
- agency workers;
- volunteers;
- governors or trustees (where applicable);
- contractors;
- work placement students;
- visitors;
- anyone working on behalf of Swindon Tuition Centre.

It applies across all Swindon Tuition Centre services and educational provision, including alternative provision, outreach, community tuition, outdoor learning and any commissioned services delivered on behalf of local authorities, schools or other partners.

Safeguarding Culture

Swindon Tuition Centre promotes a culture where safeguarding is viewed as a shared responsibility and forms part of everyday practice.

We encourage staff to:

- remain professionally curious;
- recognise and respond to early signs of need;
- report concerns promptly;
- challenge poor practice appropriately;
- seek advice whenever unsure;
- work collaboratively with families and partner agencies;
- continually reflect upon safeguarding practice to improve outcomes for children.

Children are encouraged to share worries or concerns with trusted adults and are supported to understand how to keep themselves safe, including online.

Online Safety, Filtering and Monitoring

Swindon Tuition Centre recognises that technology is a significant safeguarding issue and that abuse can occur both online and offline.

The Leadership Team is responsible for ensuring that appropriate filtering and monitoring systems are in place across Swindon Tuition Centre digital devices and networks. These arrangements are reviewed at least annually by a member of the Senior Leadership Team, supported by the Designated Safeguarding Lead (DSL), to ensure they remain effective, proportionate and appropriate to the needs of learners. Any actions or improvements identified through the review are recorded within the Centre's safeguarding records/action plan and monitored through to completion.

All staff are responsible for:
• Understanding their role in maintaining online safety;
• Recognising indicators of online abuse, exploitation and harmful online behaviour;
• Reporting concerns arising from device use, internet activity or online interactions to the DSL or DDSL immediately;
• Following Swindon Tuition Centre's Online Safety and Acceptable Use procedures;
• Online safety forms part of safeguarding induction, annual safeguarding training and regular safeguarding updates for all staff.

Mobile Phones and Personal Devices

Swindon Tuition Centre recognises that mobile phones and personal devices can present safeguarding risks within an education setting. All staff, students and visitors are expected to follow the organisation's Mobile Phone Policy to ensure that mobile phone use does not compromise the safety, privacy or wellbeing of children and young people.

Staff must not use personal mobile phones to photograph, record or communicate with students. Personal devices must not be used to store or share photographs, videos, personal information or other confidential information relating to students. Swindon Tuition Centre will provide work-related mobile phones for staff to use when supporting students. These phones may be used to upload students' work, document progress, and record relevant information in line with Swindon Tuition Centre safeguarding, data protection and mobile phone policies.

Where a student requires access to a mobile phone, this should be managed in accordance with the Mobile Phone Policy and any individual risk assessment or support plan in place.

Staff must maintain appropriate professional boundaries when communicating with students and must not use personal social media accounts, personal messaging applications or personal contact details to communicate with students unless specifically authorised by Swindon Tuition Centre and in line with safeguarding procedures.

Any concerns relating to inappropriate mobile phone or other technology use, including the taking or sharing of photographs or recordings, inappropriate communication, accessing unsuitable content, cyberbullying, misuse of artificial intelligence (AI) tools, or suspected online safeguarding concerns, must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) and recorded in accordance with Swindon Tuition Centre safeguarding procedures. Staff and learners are expected to use AI safely and responsibly, in line with the Centre's Code of Conduct and Online Safety and Acceptable Use procedures.

The organisation may take proportionate action where mobile phone use presents a safeguarding concern, in line with the Mobile Phone Policy, behaviour procedures and relevant safeguarding procedures.

Equality, Diversity and Inclusion

Swindon Tuition Centre recognises that some children may face additional barriers to disclosure or accessing support because of disability, communication needs, culture, ethnicity, religion, gender, sexual orientation, gender identity or previous experiences.

Safeguarding arrangements will always take account of each child's individual circumstances and reasonable adjustments will be made where appropriate to ensure every learner can access support.

Organisational Safeguarding Commitment:

Swindon Tuition Centre is committed to maintaining effective safeguarding governance through regular policy review, safeguarding audits, quality assurance, staff supervision, safeguarding training, multi agency partnership working and continuous organisational learning.

The Leadership Team and Safeguarding Team will monitor safeguarding practice throughout the organisation to ensure statutory responsibilities are met and that children receive the highest standard

of protection and support. Learning identified through safeguarding practice, audits, reviews and partnership working will be used to strengthen safeguarding arrangements and improve outcomes for children.

Travel and Transport Safety

Transporting young people is considered a one-to-one activity and therefore carries additional safeguarding responsibilities. Staff must ensure that the safety and welfare of the young person and themselves is always the primary consideration, maintaining professional boundaries and following the Staff Behaviour Policy. One-to-one transport is permitted where the young person has been assessed as safe to travel with a single staff member; however, where a young person has been risk assessed as requiring two adults, this ratio must be maintained in the vehicle.

Staff may only transport young people if they hold appropriate business insurance, a valid driving licence, and are using a roadworthy vehicle. Young people should normally sit in the rear seats, as this is the safest position; however, where a young person is known to interfere with seatbelts, locks, or equipment, or where a risk assessment identifies that sitting in the front seat is safer, staff may seat the young person in the front passenger seat. In these cases, airbags must be managed safely, including being switched off when transporting a child in a rear-facing car seat. Car seats must be used for young people who require them, fitted correctly, and checked before each journey, and seatbelts must be always worn.

Staff must ensure that child locks are activated where appropriate. Staff must not stop for shops, petrol, food, or any personal errands while transporting a young person unless there is an emergency that directly affects safety.

Before transporting a young person, staff must ensure the DSL or Head of Centre is aware of who is being transported, the planned route, and the expected arrival time, and must communicate any delays or unexpected changes. In the event of a breakdown or accident, staff must ensure the young person is safe, move to a secure location if possible, and contact the DSL, Head of Centre, and the parent/carer immediately to advise them of the situation and agree next steps.

Staff should not engage in personal conversations, use their mobile phone, or play inappropriate music and should not transport additional children or adults unless this has been agreed in advance. Any concerning behaviour must be reported immediately to the safeguarding team. If a young person becomes distressed or unsafe during transport, staff should pull over safely, contact the DSL or DDSL and record the incident on CPOMS as soon as possible, calling emergency services if there is immediate danger.

Roles and Responsibilities

Safeguarding Responsibilities

Safeguarding is everyone's responsibility. Every adult working for or on behalf of Swindon Tuition Centre has a responsibility to safeguard and promote the welfare of children and young people.

All staff must understand their safeguarding responsibilities, act in accordance with this policy and statutory guidance, and recognise that safeguarding forms part of everyday practice regardless of role or seniority.

Proprietor / Owner and Director

The Proprietor / Owner and Director has overall accountability for safeguarding arrangements across Swindon Tuition Centre and is responsible for ensuring that:

- Safeguarding remains a strategic priority across the organisation;
- Appropriate safeguarding policies and procedures are implemented and reviewed annually;
- Sufficient resources are provided to enable effective safeguarding arrangements;
- A suitably qualified Designated Safeguarding Lead (DSL) and appropriately trained Deputy Designated Safeguarding Leads (DDSLs) are appointed;
- Safeguarding concerns are responded to appropriately and in accordance with statutory guidance;
- Safer recruitment arrangements are effective;
- Safeguarding governance, audits and quality assurance are undertaken regularly;
- Safeguarding practice is continuously reviewed to support organisational learning and improvement.
- Ensuring safeguarding remains central to organisational strategy, decision-making and organisational culture.

Leadership Team

The Leadership Team is responsible for:

- Promoting a strong safeguarding culture throughout the organisation;
- Ensuring safeguarding responsibilities are embedded within strategic and operational decision-making;
- Monitoring safeguarding performance through audits, quality assurance and safeguarding reports;
- Ensuring appropriate staffing, supervision and safeguarding training;
- Supporting the DSL in fulfilling statutory safeguarding responsibilities;
- Ensuring safeguarding risks are appropriately managed across all educational provision.
- Reviewing safeguarding data, themes, complaints, low-level concerns and learning from incidents to identify trends and drive continuous improvement.

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead provides operational leadership for safeguarding and child protection and is responsible for:

- Managing child protection concerns and referrals;
- Providing safeguarding advice and guidance to staff;
- Maintaining accurate safeguarding records;
- Ensuring safeguarding concerns are recorded promptly and appropriately;
- Working collaboratively with children's social care, police, health professionals and safeguarding partners;
- Overseeing Early Help where appropriate;
- Ensuring safeguarding training remains current;
- Monitoring safeguarding trends to identify organisational learning;
- Reporting safeguarding matters to the Leadership Team;
- Maintaining oversight of safeguarding across all STC provisions.

Deputy Designated Safeguarding Leads (DDSLs)

Deputy Designated Safeguarding Leads support the DSL and are appropriately trained to undertake safeguarding responsibilities.

DDSLs may carry out safeguarding duties delegated by the DSL and will assume safeguarding leadership where required during the DSL's absence.

AP Managers, Site Managers and Line Managers

Managers are responsible for ensuring safeguarding is embedded within day-to-day practice by:

- Creating a safe and supportive culture for learners and staff;
- Ensuring safeguarding concerns are reported immediately;
- Maintaining professional curiosity;
- Supporting staff wellbeing following safeguarding incidents;
- Ensuring safeguarding forms part of supervision and appraisal discussions where appropriate;
- Monitoring attendance, welfare and emerging risks;
- Escalating concerns promptly to the Safeguarding Team.

All Staff Regardless of Role

- All staff, including those who do not work directly with children, must read and understand Part One of Keeping Children Safe in Education 2026.
- All staff receive safeguarding induction appropriate to their role before or as soon as reasonably practicable after commencing work with Swindon Tuition Centre. This includes the organisation's safeguarding procedures, reporting arrangements, staff code of conduct, whistleblowing arrangements, online safety, professional boundaries and relevant safeguarding risks. This is then refreshed at least annually
- Maintain an attitude of "it could happen here" when considering safeguarding concerns;
- Recognise indicators of abuse, neglect, exploitation and harm;
- Report safeguarding concerns immediately in accordance with organisational procedures;
- Maintain professional boundaries at all times;
- Contribute to a child-centred safeguarding culture;
- Participate in safeguarding training and regular updates;
- Work collaboratively with colleagues and partner agencies to safeguard children.

Volunteers, Agency Workers, Contractors and Visitors

Anyone working for or on behalf of Swindon Tuition Centre must:

- Comply with this policy;
- Report safeguarding concerns immediately;
- Follow safeguarding procedures;
- Maintain professional boundaries;
- Understand how to access safeguarding support from the Safeguarding Team.

Visitors will receive appropriate safeguarding information on arrival and must be supervised where appropriate.

Children and Learners

Swindon Tuition Centre encourages children to:

- Speak to a trusted adult if they are worried;
- Contribute to safeguarding discussions where appropriate;
- Understand how to keep themselves safe, including online;
- Report concerns about themselves or others.

Children will be listened to, treated with respect and supported throughout safeguarding processes.

Parents, Carers, Commissioners and Partner Agencies

Swindon Tuition Centre recognises that safeguarding is most effective when working in partnership with families, commissioners and external agencies.

Parents, carers and commissioning organisations are encouraged to share safeguarding information promptly so that appropriate support can be provided.

Swindon Tuition Centre values effective partnership working and recognises that timely information sharing and collaborative decision-making are fundamental to achieving the best safeguarding outcomes for children.

No member of staff should assume that another colleague has taken action to safeguard a child. Where there is any doubt that appropriate action has been taken, staff must seek immediate advice from the Designated Safeguarding Lead, a Deputy Designated Safeguarding Lead or another appropriate safeguarding professional.

Concerns About Adults Working with Children

Concerns regarding the behaviour or conduct of adults working in or on behalf of Swindon Tuition Centre will be managed in accordance with the organisation's Low-Level Concerns Policy or Managing Allegations and Concerns About Adults Policy, depending on the nature and seriousness of the concern.
Where there is any uncertainty regarding the appropriate threshold, advice should be sought from the Designated Safeguarding Lead (DSL), Human Resources and, where appropriate, the Local Authority Designated Officer (LADO).

Safer Recruitment

Swindon Tuition Centre is committed to safer recruitment practices to ensure that all adults working with children are suitable to do so. Recruitment processes will be proportionate to the role and will follow all relevant statutory requirements and guidance.

Before employment or engagement, appropriate checks will be completed, including verification of identity, right to work, relevant qualifications and references, together with the required Disclosure and Barring Service (DBS) checks and prohibition checks where applicable. The required recruitment and safeguarding checks will be recorded on the Single Central Record (SCR) where applicable.

Agency staff, contractors, volunteers and other adults working with learners will be subject to appropriate safeguarding and suitability checks. Swindon Tuition Centre will obtain confirmation of relevant checks from agencies or organisations where required and will ensure that these arrangements are appropriately recorded and monitored.

All recruitment checks will be securely recorded, regularly reviewed and monitored to ensure they remain complete and up to date.

Responding to Safeguarding Concerns

Immediate Action

All safeguarding concerns, regardless of how significant they may initially appear, must be taken seriously.

Staff should never assume that another person has reported a concern or that someone else will take action.

Where there is any concern about the safety or welfare of a child, staff must act immediately and report the concern to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

If a child is in immediate danger or at immediate risk of significant harm, staff must take appropriate action to safeguard the child, including contacting emergency services where necessary, and inform the DSL as soon as reasonably practicable.

Safeguarding Response to Children Absent from Education

Swindon Tuition Centre recognises that repeated or prolonged absence from education may be an indicator of abuse, neglect, exploitation or other safeguarding concerns.

All staff must remain alert to patterns of non-attendance, missed tuition sessions, unexplained absences and children who are difficult to engage.

Where concerns arise, staff will:

- Report concerns immediately to the DSL or DDSL;
- Record all absences and welfare concerns on CPOMS;
- Undertake welfare contact with parents or carers where appropriate;
- Work with commissioners, schools and the Local Authority to establish the child's safety and educational engagement;
- Consider whether the child requires Family Help or referral to Children's Social Care.

Repeated absence will always be considered within the wider safeguarding context rather than solely as an attendance issue.

The "It Could Happen Here" Principle

Swindon Tuition Centre expects all staff to maintain an attitude of "it could happen

here" when considering safeguarding concerns.

Children may not always disclose abuse directly and indicators of harm may be subtle or develop gradually over time.

Staff should remain professionally curious and should never dismiss concerns because there is no

single piece of evidence.

Professional Curiosity

Professional curiosity is essential to effective safeguarding practice. Staff should: •

Remain alert to changes in presentation, behaviour or attendance;

- Respectfully explore inconsistencies or emerging concerns;
- Consider the child's lived experience;
- Seek clarification where appropriate;
- consult the Safeguarding Team whenever unsure.

No member of staff will ever be criticised for raising a genuine safeguarding concern.

Recognising Abuse, Neglect and Exploitation

All staff should be familiar with the indicators of:

- physical abuse;
- emotional abuse;
- sexual abuse, neglect;
- child sexual exploitation;
- child criminal exploitation;
- county lines;
- domestic abuse;
- online abuse;
- peer-on-peer abuse;
- harmful sexual behaviour;
- mental health concerns that may indicate abuse or neglect.

The absence of visible injuries or a direct disclosure does not mean that abuse has not occurred.

FGM Reporting Guidance

Mandatory Reporting Duty for Teachers

Female Genital Mutilation (FGM) is illegal in the UK and is a form of child abuse that can have serious and long-lasting physical and psychological consequences.

All staff at Swindon Tuition Centre must understand their safeguarding responsibilities in relation to

FGM. Teachers must be aware of the statutory mandatory reporting duty.

Teachers must personally report to the Police where, in the course of their professional duties, they discover that FGM appears to have been carried out on a girl under the age of 18. This applies where the girl discloses that FGM has been carried out or where a teacher observes physical signs that appear to indicate FGM.

Teachers should not examine a pupil/student for signs of FGM. It will be rare for teachers to see visual evidence.

Where the mandatory reporting duty applies, the teacher must make the report directly to the Police. The teacher should also inform the DSL/DDSL, unless there is good reason not to, and the DSL/DDSL will consider whether a referral to Children's Social Care or other safeguarding partners is required.

The mandatory reporting duty does not apply to cases where FGM is suspected or where a girl is considered to be at risk of FGM. In these circumstances, staff must report the concern immediately to the DSL/DDSL, who will follow local safeguarding procedures and consider an appropriate referral to Children's Social Care and/or the Police.

This includes concerns that a child may be being taken abroad for the purpose of FGM, or where there are other indicators that the child may be at risk.

Where there is an immediate risk of serious harm or a risk to life, the Police should be contacted immediately by calling 999. For non-emergency Police matters, 101 should be used.

All concerns, actions taken and decisions made must be recorded in accordance with Swindon Tuition Centre safeguarding recording procedures.

Child-on-Child Abuse, Sexual Violence and Sexual Harassment

Swindon Tuition Centre recognises that children and young people can abuse other children and that child-on-child abuse is a specific safeguarding concern. Child-on-child abuse can take place inside or outside the education setting, face-to-face or online, and may include physical abuse, emotional abuse, bullying, coercive or controlling behaviour, discriminatory behaviour, racism, faith-targeted abuse, sexual harassment, sexual violence and harmful sexual behaviour.
Abuse will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys". The absence of reported incidents does not mean that abuse is not taking place. Children may be unable or unwilling to disclose what they are experiencing. All staff must therefore maintain an attitude of "it could happen here", remain vigilant to what they see, hear or are told, and report concerns promptly to the DSL or a DDSL.

All staff at Swindon Tuition Centre will challenge inappropriate, harmful, discriminatory or sexualised behaviour between children. Staff will not downplay or dismiss concerning behaviour as "just banter" or normalise harmful behaviour. Staff will promote a culture in which children feel safe to report concerns and know that they will be listened to and taken seriously.

All staff will receive appropriate safeguarding training to recognise signs and indicators of child-on child abuse, including harmful sexual behaviour, sexual harassment and sexual violence. Staff will understand that harmful sexual behaviour exists on a continuum and that early identification and appropriate intervention are important in preventing escalation and further harm.

When considering harmful sexual behaviour, the DSL will take account of the ages, developmental stages and individual circumstances of the children involved. The DSL will consider whether behaviour is developmentally inappropriate, problematic or abusive and will consider the needs and risks for all children involved.

Staff will also understand that a child who harms another child may themselves be experiencing abuse, neglect, exploitation or other safeguarding concerns. This possibility will be considered as part of the safeguarding response.

Responding to Concerns, Allegations or Disclosures

If a student makes an allegation or disclosure of abuse against another student:

- Staff will listen carefully, take the concern seriously, reassure the student and inform the DSL/DDSL immediately.
- Staff will record the concern factually and accurately, including relevant information, actions taken and decisions made. Staff will not investigate the allegation themselves or ask leading questions.
- The DSL will consider the individual circumstances, the wishes and feelings of the children involved, the nature and seriousness of the behaviour, any power imbalance, age or developmental differences, and any immediate or ongoing risk of harm.
- Where appropriate, the DSL will refer to Children's Social Care/Contact Swindon and/or the police and will follow the advice and direction of relevant safeguarding partners.
- A risk assessment and appropriate support plan will be considered for all children involved, including the child who has experienced the abuse and the child who has caused or is alleged to have caused harm.
- Children will be offered an appropriate trusted adult whom they can speak to about their concerns and wellbeing.
- The DSL will consider whether any child requires additional safeguarding support, early help or a child protection response.
- Appropriate information will be shared with relevant professionals in accordance with safeguarding and information-sharing requirements.
- The DSL will consider whether there are wider contextual safeguarding concerns, including concerns relating to the child's home, community, peer group or online environment.

Children who experience abuse will be reassured that they are being taken seriously and that they will be supported and kept safe. They will never be made to feel that they are creating a problem by reporting sexual violence, sexual harassment or other abuse, nor will they be made to feel ashamed for making a report.

The needs of every child involved will be considered individually. A child who has caused harm will also be safeguarded and supported, while appropriate boundaries, consequences, education and interventions are put in place.

Prevention and Education

Swindon Tuition Centre will seek to prevent child-on-child abuse by:

- Challenging derogatory, discriminatory, racist, faith-targeted, homophobic, sexist, misogynistic, sexualised or otherwise harmful language and behaviour.
- Maintaining a culture of zero tolerance towards sexual violence, sexual harassment and abusive behaviour.
- Ensuring staff understand that inappropriate or harmful behaviour should not be dismissed as “banter” or normalised.
- Providing age-appropriate education about respectful relationships, boundaries, consent, appropriate behaviour and online safety.
- Ensuring students know how and where they can report concerns and identify trusted adults they can approach.
- Providing clear information during induction, tutorials and through appropriate reminders about how students can seek help.
- Remaining alert to online abuse, including sexual harassment, image-based abuse, exploitation, coercive behaviour and AI-generated or manipulated sexual imagery.
- Considering the additional vulnerabilities of individual students, including those with SEND, communication difficulties, previous trauma, exploitation concerns or other safeguarding needs.
- Ensuring staff understand that child-on-child abuse may be an indicator of wider abuse, exploitation or safeguarding concerns affecting either child.
- Recording, reviewing and learning from incidents to identify patterns, emerging risks and areas requiring further preventative action.
- Swindon Tuition Centre will promote healthy, respectful relationships and will ensure that safeguarding education supports children to understand appropriate boundaries, consent, respect and how to seek help.

All incidents will be managed in accordance with this policy, STC safeguarding procedures and the current requirements of Part Five of Keeping Children Safe in Education (KCSIE) 2026, where applicable.

The Prevent Duty

Swindon Tuition Centre recognises its responsibility under the Prevent Duty to safeguard children and young people from the risk of being drawn into terrorism or supporting terrorism. Prevent forms part of STC’s wider safeguarding responsibilities and is concerned with early identification, intervention and support for children who may be susceptible to radicalisation.

All staff will remain alert to changes in a child’s behaviour, attitudes, relationships, interests or circumstances which may indicate that they are vulnerable to radicalisation. Staff will use their professional judgement and consider the wider context and individual circumstances of the child when identifying concerns.

Staff will follow the Notice, Check, Share approach when considering a Prevent concern:

- Notice – recognise signs that a child may be vulnerable to radicalisation or being drawn into terrorism.
- Check – discuss the concern with the DSL/DDSL or Prevent Lead and consider the wider safeguarding context and available information.
- Share – where appropriate, the DSL will make a Prevent referral to the police using the current Prevent National Referral Form and follow the relevant local procedures.

Prevent concerns will be managed proportionately and in accordance with STC's safeguarding procedures. A Prevent referral does not mean that a child has committed a criminal offence. The purpose of Prevent is to identify vulnerability at an early stage and provide appropriate support where required.

Where a Prevent referral is made, specialist police officers will assess the concern and determine the most appropriate next steps. This may include no further action, signposting to other services or consideration for support through the Channel process. Channel is a voluntary, multi-agency safeguarding programme designed to provide tailored support to individuals who are assessed as being susceptible to radicalisation and at risk of being drawn into terrorism.

Where a child is considered for or supported through Channel, Swindon Tuition Centre will cooperate with the relevant professionals and agencies, share appropriate safeguarding information and contribute to the assessment and support process where requested. The DSL/DDSL will attend relevant multi-agency meetings where appropriate.

Swindon Tuition Centre will maintain an awareness of the local Prevent and Channel arrangements for Swindon and will seek advice from the relevant local authority Prevent team or police where required. Current local guidance identifies education settings as having a role in identifying concerns early and following national Prevent referral procedures.

Where there are wider safeguarding concerns alongside a Prevent concern, the DSL will consider whether a referral to Children's Social Care/Contact Swindon or another appropriate safeguarding service is also required.

The DSL will consider, where appropriate and lawful, whether relevant safeguarding information should be shared with a child's new education setting when they leave STC, particularly where this is necessary to support continuity of safeguarding arrangements or an existing Channel support plan.

If a child is at immediate risk of harm, staff will follow STC's emergency safeguarding procedures and contact the emergency services where necessary.

All staff will receive appropriate Prevent awareness training and will understand that concerns relating to radicalisation must be treated as safeguarding concerns and reported promptly to the DSL/DDSL.

Responding to a Disclosure

If a child chooses to disclose information, staff should:

- remain calm;
- listen carefully;
- reassure the child that they have done the right thing by speaking;
- avoid asking leading questions;
- avoid making promises of confidentiality;
- explain that the information will need to be shared with people who can help keep them safe;
- record the child's words as accurately as possible;
- report the concern immediately to the Safeguarding Team.

Staff must never investigate safeguarding concerns themselves.

Recording Safeguarding Concerns

All safeguarding concerns must be recorded as soon as possible after the concern arises using the organisation's approved safeguarding recording system (currently CPOMS).

Safeguarding records should:

- be factual and accurate;
- distinguish between fact, observation and professional opinion;
- include dates, times and those present;
- record the child's own words wherever possible;
- include a clear summary of the concern;
- record actions taken;
- record decisions made and the rationale for those decisions;
- record any outcomes and follow-up actions;
- be completed promptly and contemporaneously wherever possible.

Safeguarding records are confidential and will only be shared with those who have a legitimate safeguarding need to know.

Information Sharing

Effective safeguarding depends upon appropriate information sharing.

Swindon Tuition Centre will share information with safeguarding partners, local authorities, police, health professionals and commissioning organisations where necessary to safeguard children and in accordance with the Data Protection Act 2018, UK GDPR and statutory safeguarding guidance.

Fear of sharing information must never prevent appropriate action being taken to safeguard a child.

Escalating Concerns

If a member of staff believes that appropriate safeguarding action has not been taken, they have a professional responsibility to escalate their concern.

This may include:

- speaking again with the DSL;
- contacting another DDSL;
- raising concerns with the Leadership Team;
- using the Whistleblowing Policy where appropriate;
- contacting children's social care directly where immediate safeguarding concerns remain.

Staff should always act in the child's best interests.

Professional Challenge

Swindon Tuition Centre encourages respectful professional challenge where staff believe safeguarding decisions may not adequately protect a child.

Professional challenge forms part of effective safeguarding practice and supports better outcomes for children.

Support for Staff

Safeguarding incidents can be distressing.

Swindon Tuition Centre is committed to supporting staff who are involved in safeguarding matters through:

- Supervision:
- Management Support;
- Debrief opportunities;
- Access to wellbeing support where appropriate;
- Additional safeguarding guidance and training.

Learning from Safeguarding Practice

Following safeguarding incidents, concerns, audits, complaints or safeguarding practice reviews, the Leadership Team and Safeguarding Team will identify opportunities for organisational learning to strengthen safeguarding practice, improve procedures and enhance outcomes for children.

Quality Assurance

Safeguarding arrangements will be subject to regular quality assurance including:

- Safeguarding audits;
- Case file reviews;
- Supervision;
- Training compliance;
- Policy review;
- Safeguarding data analysis;
- Feedback from learners;
- Feedback from staff;
- Commissioner feedback;
- Learning from safeguarding incidents.

Findings will be used to support continuous improvement.

Final Statement

Safeguarding is fundamental to Swindon Tuition Centre's vision, values and culture.

Every member of staff has both the authority and responsibility to take action where they believe a child may be at risk.

By working together with children, families, commissioners and partner agencies, Swindon Tuition Centre aims to provide a safe, inclusive environment where every learner is protected, supported and enabled to achieve their full potential.

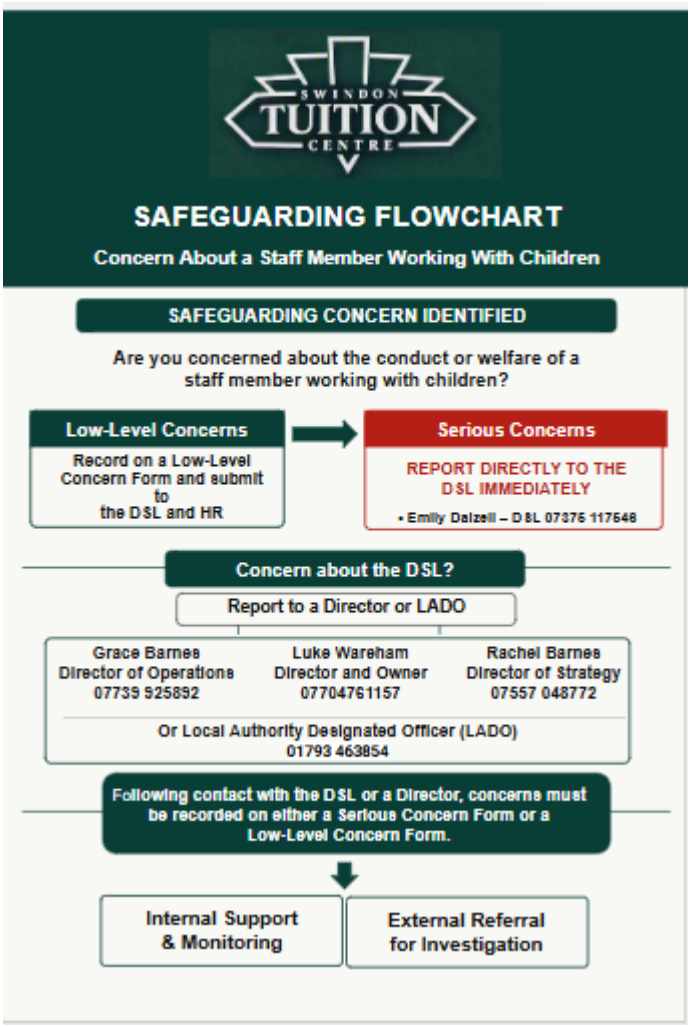
Version: 2.0

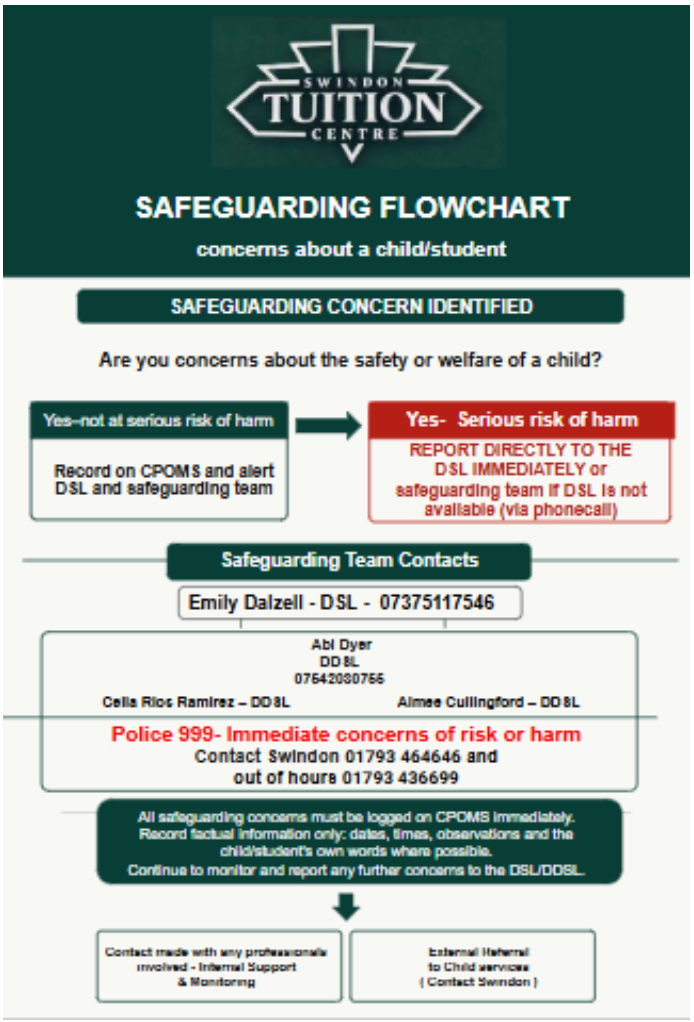
Approved: 04 September 2026

Review: 1 September 2027

Owner: Director of Strategy

Appendix A – What to Do if You Have a Safeguarding Concern





Remember

✔ Safeguarding is everyone's responsibility.

✔ Never assume someone else has reported a concern.

✔ Never promise confidentiality.

✔ Listen, reassure and report.

✔ Record concerns as soon as possible.

✔ If in doubt, speak to the DSL or a DDSL.

✔ If you believe appropriate action has not been taken, escalate your concern.

Immediate Danger

If a child is at immediate risk of serious harm:

- Contact **999** immediately if emergency assistance is required.
- Inform the **DSL** or a **DDSL** as soon as it is safe to do so.

- Record the actions taken on the organisation's safeguarding recording system (CPOMS) at the earliest opportunity.

Appendix B – Types of Abuse and Indicators of Harm

Purpose

This appendix provides an overview of the main categories of abuse and common indicators that may suggest a child is experiencing abuse, neglect or exploitation.

The presence of one or more indicators does not necessarily mean abuse has occurred. Staff should consider the child's individual circumstances, exercise professional curiosity and always report concerns to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical abuse may also include situations where a child's physical wellbeing is deliberately or recklessly placed at risk.

Possible indicators may include:

- Unexplained bruises, burns or injuries.
- Injuries inconsistent with the explanation provided.
- Frequent injuries or repeated accidents.
- Fear of physical contact.
- Wearing clothing to cover injuries.
- Reluctance to return home.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child resulting in severe and persistent adverse effects on their emotional development. Emotional abuse may involve deliberately trying to make a child feel worthless, inadequate, unloved or frightened. It may include humiliation, criticism, controlling behaviour, threats, intimidation, bullying, or preventing a child from expressing their views. It may also include witnessing the ill-treatment of another person.

Possible indicators may include:

- Low self-esteem.
- Excessive anxiety or fearfulness.
- Sudden behavioural changes.
- Social withdrawal.
- Delayed emotional development.
- Self-harm or suicidal ideation.
- Overly compliant or aggressive behaviour.

Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It may involve physical contact, including assault by penetration or non-penetrative acts, or non-contact activities such as involving children in looking at or producing sexual images, watching sexual activities, grooming, or encouraging children to behave in sexually inappropriate ways.

Sexual abuse can be perpetrated by adults or by other children or young people and may take place within families, peer groups, educational settings, institutions or online.

Possible indicators may include:

- Sexualised behaviour inappropriate for age.
- Pregnancy or sexually transmitted infections.
- Reluctance to change for PE.
- Self-harm.
- Anxiety around particular individuals.
- Sudden deterioration in emotional wellbeing.
- Disclosure of abuse.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development.

Neglect may include failing to provide adequate food, clothing or shelter; failing to provide adequate supervision; failing to protect a child from physical or emotional harm or danger; failing to ensure access to appropriate medical care or treatment; or failing to respond appropriately to a child's emotional needs.

Possible indicators may include:

- Poor hygiene.
- Inadequate clothing.
- Persistent hunger.
- Untreated medical needs.
- Poor attendance.
- Fatigue.
- Developmental delay.
- Lack of supervision.

Additional Safeguarding Risks

Staff should also remain alert to wider safeguarding concerns including:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Domestic Abuse
- Online Abuse
- Harmful Sexual Behaviour
- Child-on-Child Abuse
- Serious Violence
- Radicalisation and Extremism (Prevent)
- Missing Education
- Forced Marriage
- Honour-Based Abuse
- Female Genital Mutilation (FGM)
- Modern Slavery and Human Trafficking
- Mental Health concerns that may indicate abuse or neglect
- Substance Misuse
- Homelessness
- Upskirting
- Sextortion
- AI-enabled abuse and online exploitation

Contextual Safeguarding

Staff should recognise that abuse may occur beyond the family environment. Children may experience harm:

- Online;
- Within peer groups;
- In the community;
- Through exploitation;
- Within intimate relationships;
- Through criminal or sexual exploitation.

Remember

Not all children will disclose abuse.

Changes in behaviour, attendance, emotional wellbeing or presentation may be the only indicators that something is wrong.

Always:

✔ Remain professionally curious.

✔ Listen.

✔ Observe.

✔ Record.

✔ Report.

Appendix C – Responding to a Child's Disclosure Purpose

Children rarely disclose abuse in a clear or straightforward way.

A calm, supportive and professional response can significantly influence whether a child feels safe enough to continue sharing information.

If a Child Tells You Something…

DO

✔ Stay calm.

✔ Listen carefully.

✔ Allow the child to speak freely.

✔ Take what they say seriously.

✔ Reassure them that they have done the right thing by telling you.

✔ Explain that you will need to share the information with people who can help keep them safe.

✔ Ask only open questions if clarification is absolutely necessary, for example: "Can you tell me what happened?"

✔ Record the child's own words as accurately as possible.

✔ Report the disclosure immediately to the DSL or DDSL.

DO NOT

✘ Promise to keep secrets.

✘ Ask leading questions.

✘ Interrupt unnecessarily.

✘ Investigate.

✘ Express shock or disbelief.

✘ Make judgements about the alleged person.

✘ Contact parents yourself unless directed by the DSL.

✘ Delay reporting the concern.

Recording the Disclosure

As soon as possible:

Record:

- date;
- time;
- location;
- people present;
- exactly what was said using the child's own words where possible;
- your observations;
- actions taken.

Avoid:

- assumptions;
- opinions;
- speculation;
- interpreting the child's meaning.

Clearly distinguish between:

- Fact;
- Observation;
- Professional opinion.

After the Disclosure

The Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) will:

- Assess the concern;
- Consider immediate safeguarding needs;
- Decide whether an Early Help Assessment is appropriate;
- Seek advice where necessary;

- Make referrals to Children's Social Care or the Police where appropriate; •

Ensure actions are recorded;

- Continue to monitor the child's welfare.

Confidentiality

Safeguarding information is shared strictly on a **need-to-know** basis.

Staff should not discuss safeguarding concerns with colleagues unless they are directly involved in safeguarding the child.

Supporting the Child

Following a disclosure, staff should continue to:

- Treat the child normally;
- Remain supportive;
- Avoid repeatedly questioning them;
- Maintain professional boundaries;
- Report any further concerns immediately.

Supporting Staff

Swindon Tuition Centre recognises that safeguarding disclosures can be distressing. Following serious safeguarding incidents, staff may access:

- Supervision;
- Management support;
- Debrief opportunities;
- Safeguarding advice;
- Wellbeing support;
- Additional training where appropriate.

Remember

Listen. Reassure. Record. Report.

Never investigate.

Never promise confidentiality. Never delay reporting.

Always act in the child's best interests.

Appendix D – Safeguarding Contact Directory

Role/Agency	Name	Telephone	Email	Out of Hours
DSL	Emily Dalzell	07375117546	safeguarding@swindontuitioncentre.co.uk	
DDSL	Abi Dyer Celia Ramirez Aimee Cullingford		safeguarding@swindontuitioncentre.co.uk	
Owner/Director	Luke Wareham	07704761157	luke@swindontuitioncentre.co.uk	
Local Authority Designated Officer (LADO)	LADO	01793 463854	LADO@swindon.gov.uk	
Contact Swindon	Contact Swindon	01793 464646 (Monday–Thursday 8:30am–5:00pm, Friday 8:30am–4:30pm)	Contactchildrenandfamilies@swindon.gov.uk	
Emergency Duty Team	Emergency Duty Team	01793 436699 (available nights, weekends, and bank holidays)		
Police	Police	101/999		
NSPCC Helpline	NCPCC	0808 800 5000		

This policy should be read in conjunction with the following policies :

- Behaviour
- Recruitment and Selection
- Whistleblowing
- Code of Conduct for Staff/ Staff Behaviour Policy
- Anti-Bullying Child on Child Abuse
- Online Safety
- Mental Health

- Policy on Supporting Children in Care
- Attendance including the safeguarding response to children who go missing
- Health and Safety
- Staff and Student Phone Policy