

ABC Education Limited Safeguarding Policy and Procedures

Date: 02/09/2025

Review Date: 1st April 2026

1. Introduction and Policy Statement

At ABC Education Limited, we are unwavering in our commitment to safeguarding and promoting the welfare of all children and young people engaged in our services. This commitment is integral to our values and is embedded in our governance, operations, and partnerships.

This policy outlines our safeguarding principles and procedures, ensuring that all staff, tutors, and partners understand their roles in identifying, responding to, and preventing abuse, neglect, exploitation, and harm.

Our safeguarding practice is grounded in the following core values:

- **Child-Centred Approach:** Prioritising the best interests of the child in all actions and decisions.
- **Accountability:** Recognising that safeguarding is everyone's responsibility.
- **Transparency:** Fostering open communication and reporting without fear of reprisal.
- **Prevention:** Identifying signs early and acting promptly to prevent harm.
- **Professional Curiosity:** Maintaining a questioning attitude and not dismissing concerns.

ABC Education Limited adheres to current legislation and guidance, including:

- *Children Act 1989 and 2004*
- *Keeping Children Safe in Education (KCSIE) 2025*
- *Working Together to Safeguard Children 2023*
- *Education Act 2002*
- *The Equality Act 2010*
- *Data Protection Act 2018 and UK GDPR*
- *Counter-Terrorism and Security Act 2015 (Prevent Duty)*

2. Purpose and Scope

Purpose

This policy outlines how ABC Education Limited identifies, prevents, and responds to safeguarding concerns and creates a culture of safety and vigilance. It serves to:

- Establish clear responsibilities and procedures for safeguarding all children and young people (CYP) engaging with ABC Education.
- Support all staff and tutors in recognising and responding to abuse, neglect, and exploitation.
- Promote a culture where safeguarding is embedded in daily practice.
- Ensure timely and appropriate responses to concerns, disclosures, or allegations.

Scope

This policy applies to all ABC Education Limited personnel, including:

- Company directors and senior leadership
- Employed staff and freelance tutors
- Administrative and support staff
- Volunteers, contractors, and consultants
- Partner schools and organisations

Everyone within the organisation, regardless of role or seniority, has a responsibility to

- Understand and follow this policy and accompanying procedures
- Prioritise the safety and welfare of children and young people

3. Definitions and Key Concepts (as per KCSIE 2025)

Safeguarding and promoting the welfare of children is defined as:

“Providing help and support as soon as problems emerge; protecting from maltreatment (including online); preventing impairment of mental and physical health or development; ensuring safe and effective care and taking action to enable best outcomes.”

(KCSIE 2025)

3.1 Abuse and Neglect

Abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Types of Abuse:

- **Physical abuse** – Causing physical harm including hitting, shaking, burning, or poisoning.
 - **Emotional abuse** – Persistent emotional ill-treatment affecting emotional development. Includes bullying, humiliation, and withholding affection.
 - **Sexual abuse** – Forcing or enticing a child to take part in sexual activities (contact or non-contact), whether they understand or not.
 - **Neglect** – Persistent failure to meet a child's basic physical or emotional needs, likely to result in harm.
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3.2 Additional Forms of Harm and Risk (KCSIE 2025 Annex B)

Staff and tutors must also be alert to:

- **Child-on-child abuse** – Harm caused by other children or young people, including bullying, sexual violence and harassment, and physical abuse.
 - **Sexual violence and harassment** – Any unwanted sexual behaviour online or offline.
 - **Harmful sexual behaviour (HSB)** – Sexual behaviour that is developmentally inappropriate, coercive, or abusive.
 - **Serious violence and criminal exploitation** – Including **county lines**, youth violence, and knife crime.
 - **Radicalisation and extremism** – Grooming children into extremist ideologies.
 - **Online abuse and harmful content** – Exposure to grooming, sexualised content, or coercive online behaviour.
 - **Children missing education (CME)** – Prolonged, unexplained absence from education may indicate safeguarding concerns.
 - **Mental health issues** – Poor mental health may be both a symptom and indicator of abuse or neglect.
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3.3 Contextual Safeguarding

Children may face risks outside the home or education setting (e.g., in peer groups, neighbourhoods, or online). Staff must consider the **wider safeguarding context** when responding to concerns, including how external factors may influence harm or vulnerability.

3.4 Significant Harm

“Significant harm is the threshold at which local authorities must consider whether compulsory intervention is required to protect a child.”

This includes:

- Severe or persistent ill-treatment
- Neglect leading to developmental harm
- Exposure to consistent abuse or dangerous environments

4. Roles and Responsibilities

Safeguarding is everyone’s responsibility. All staff and tutors, regardless of role or seniority, must maintain a culture of vigilance and act immediately on concerns.

4.1 The Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for safeguarding and child protection at ABC Education. This is a senior leadership role and cannot be delegated. However, some activities may be supported by the Deputy DSL (DDSL).

ABC Education Limited DSL:

Name: Claire McAvoy

Phone: 01420 610 147

Email: safeguarding@abctutoring.co.uk

Key responsibilities:

- Lead on all safeguarding and child protection matters
- Be available during working hours for staff and tutors to raise concerns via phone or email (safeguarding@abctutoring.co.uk) and be available outside of working hours via email.
- Liaise with local authorities, social care, and other safeguarding partners
- Ensure all safeguarding records are accurately maintained and stored securely

- Refer concerns promptly to appropriate services, including the police, children's services, or LADO (Local Authority Designated Officer)
 - Support staff involved in safeguarding cases
 - Maintain oversight of safeguarding practice and policy implementation
 - Ensure all staff and tutors are trained in safeguarding (induction and annual refreshers)
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4.2 Deputy Designated Safeguarding Lead (DDSL)

Name: Allicia Buckle

Phone: 01420 610 147

Email: safeguarding@abctutoring.co.uk

The DDSL supports the DSL and acts in their absence. While they can manage safeguarding concerns, ultimate accountability remains with the DSL.

4.3 Company Directors

Company Directors are responsible for:

- Ensuring there is a robust safeguarding policy in place and that it is implemented effectively
 - Appointing a qualified and trained DSL
 - Monitoring and reviewing safeguarding incidents and training records
 - Ensuring safer recruitment procedures are in place and followed
 - Holding accountability for the effectiveness of safeguarding systems
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4.4 All Staff and Tutors

All ABC Education team members who work directly with children:

- Read and understand Part One (or Annex A) of *Keeping Children Safe in Education 2025*
- Be familiar with this policy and the Safeguarding Concern Form
- Be alert to signs of abuse, neglect, exploitation, or unusual behaviour
- Record and report any concerns to the DSL as soon as possible

- Maintain appropriate professional boundaries at all times
- Complete safeguarding training at induction and refresh annually

Failure to follow safeguarding procedures may result in disciplinary action and/or referral to external agencies.

4.5 Safeguarding Partners and Agencies

ABC Education works closely with the following safeguarding bodies:

- **Local Authority Designated Officer (LADO)** – For allegations against staff
- **Children’s Social Care Services** – For referrals and assessments
- **Police/Prevent Duty Coordinators** – Where immediate danger, criminal activity, or radicalisation is suspected
- **Schools and Local Authorities** – To align safeguarding records and planning for CYP in dual-registered or AP placements

We recognise our legal duty to refer concerns under:

- Section 47 (reasonable cause to suspect significant harm)
 - Section 17 (children in need of support)
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4.6 External Contractors and Volunteers

All contractors and volunteers working with children must:

- Undergo relevant vetting checks (e.g. Enhanced DBS with Children’s Barred List)
- Receive safeguarding guidance or training proportionate to their role
- Agree to abide by ABC Education’s Safeguarding Policy and professional conduct expectations

They must report all safeguarding concerns directly to the DSL.

5. Safer Recruitment

ABC Education Limited is committed to recruiting individuals who share our values and commitment to safeguarding. We implement safer recruitment practices to ensure that all those who work with children and young people are suitable, appropriately vetted, and safe to do so.

We follow the statutory guidance outlined in *Keeping Children Safe in Education 2024*, as well as relevant employment legislation.

5.1 Safer Recruitment Aims

Our safer recruitment process aims to:

- Deter unsuitable individuals from applying
 - Identify and reject applicants who may pose a safeguarding risk
 - Ensure staff and tutors understand their safeguarding responsibilities
 - Maintain consistent and thorough practices across all appointments
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5.2 Recruitment and Selection Process

All recruitment to tutoring and staff positions includes the following:

1. Clear Job Descriptions and Person Specifications

- All roles include a clear statement about safeguarding responsibilities.
- Person specifications outline the values, behaviours, and attitudes required for work with children.

2. Advertising and Application

- All adverts include our commitment to safeguarding and the requirement for DBS clearance.
- Applicants are required to complete a full application form or submit a CV alongside a safeguarding self-declaration.

3. Shortlisting

- Applications are assessed for suitability based on qualifications, experience, and alignment with safeguarding expectations.
- Gaps in employment or education history are flagged and must be satisfactorily explained.

4. Interview

- Interviews assess attitudes toward safeguarding and include scenario-based safeguarding questions.

- Tutors are asked to describe how they would handle disclosures or manage online safety risks.

5. ID and Qualification Checks

- Original documents are verified for:
 - Proof of identity
 - Right to work in the UK
 - Relevant qualifications
 - Proof of address (recent utility bill or bank statement)

6. References

- A minimum of two professional references are required, including the most recent employer.
- References must confirm suitability and include facts of any substantiated safeguarding concerns meeting the harm threshold.
- References are checked for consistency and any safeguarding concerns.

7. Enhanced DBS Checks

- All staff and tutors must have an enhanced Disclosure and Barring Service (DBS) check with a check of the children's barred list.
- The DBS certificate must be registered with the **Update Service** and kept current.
- Any positive disclosures are risk assessed on a case-by-case basis.

8. Overseas Checks

- Where staff have lived or worked outside the UK, overseas criminal records and certificates of good conduct are obtained in line with Home Office and KCSIE 2025 guidance.

5.3 Pre-Engagement and Induction

No staff or tutor may begin work with CYP until all vetting checks are complete and verified. Before any teaching can commence, individuals must:

- Provide evidence of all required documents and clearance
- Complete ABC Education's **Safeguarding Induction**

- Sign to confirm they have read:
 - This Safeguarding Policy
 - The Staff Code of Conduct
 - Part One (or Annex A) of KCSIE 2025
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5.4 Ongoing Suitability and Monitoring

- Enhanced DBS checks are repeated **every 6 months**, exceeding statutory minimums to uphold safeguarding integrity.
 - Staff and tutors must inform the DSL or directors immediately if:
 - They are arrested, cautioned, charged, or convicted
 - There is a change in their personal circumstances that may affect suitability to work with children
 - Safer recruitment practices also apply to internal promotions or role changes involving contact with CYP.
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5.5 Single Central Record (SCR)

ABC Education maintains an up-to-date **Single Central Record (SCR)** of all staff and tutors, which includes:

- Identity and qualification checks
- Right to work in the UK
- Enhanced DBS check details
- Barred list status
- Overseas checks (where applicable)
- Safeguarding training records

The SCR is regularly audited by the DSL and directors.

6. Induction, Training, and Continued Professional Development (CPD)

ABC Education recognises that safeguarding is most effective when all staff are confident, competent, and up to date with best practice. All team members receive comprehensive induction, mandatory safeguarding training, and ongoing professional development to ensure that they can safeguard children effectively. The DSL and DDSL

training is updated every two years and includes PREVENT training. Evidence of this is maintained within the Directors Certificates file.

6.1 Safeguarding Induction

All staff and tutors must complete safeguarding induction training **before commencing work** with children or young people (Certification of Level 2 Safeguarding or higher) This includes:

- Overview of an individual's safeguarding responsibilities
- Roles and contact information for the DSL and Deputy DSL
- How to identify signs of abuse, neglect, and exploitation
- Understanding of contextual and online safeguarding
- Procedures for reporting concerns or disclosures
- Familiarisation with:
 - ABC's Safeguarding Policy
 - KCSIE Part One (or Annex A for non-teaching roles)
 - Staff Code of Conduct
 - Whistleblowing Policy
 - Online Safety Policy

A signed declaration is retained to confirm the staff member understands their safeguarding duties.

6.2 Mandatory Safeguarding Training

All staff and tutors are required to complete the following:

Training Area	Frequency
Core safeguarding training	On induction, then annually
Prevent Duty awareness	On induction, then refreshed every 3 years

Training Area	Frequency
Child-on-child abuse and HSB	Annual
Online safety and filtering	Annual
SEND and inclusion	On induction if necessary, then as required
Whistleblowing and reporting	On induction, then annually

Additional or bespoke training may be provided in response to incidents, trends, or identified areas for improvement.

6.3 Continued Professional Development (CPD)

ABC Education is committed to the ongoing development of all staff and tutors. CPD opportunities include:

- Access to a bank of online CPD modules
- Monthly “Dial-a-Director” reflective sessions
- Tutor observations with written feedback
- Training in trauma-informed approaches, emotional regulation, and behaviour support
- Attendance at externally delivered safeguarding and education workshops
- Training updates based on changes in legislation (e.g. KCSIE revisions)

6.4 Oversight and Recordkeeping

- The DSL and Company Directors maintain training records for all staff and tutors.
- Training logs include dates, topics, and renewal deadlines.
- Staff who fail to complete or engage with training may be suspended or removed from duties until compliant.

6.5 Staff Competence and Professional Development Planning

As part of supervision and quality assurance processes, ABC Education uses tutor feedback, observations, and session reports to identify training needs. Individual development plans may be created to support:

- Gaps in safeguarding confidence
- Supporting complex SEND needs
- Managing disclosures and emotional responses
- Adapting provision to online or home settings

7. Online Safety

ABC Education is committed to safeguarding children and young people in both physical and digital environments. Online tuition introduces unique risks that require clear boundaries, protective systems, and staff vigilance to ensure children are safe while learning remotely. Staff should be alert to harms from misinformation, disinformation and conspiracy theories.

Our approach aligns with the latest **KCSIE 2025** expectations around filtering, monitoring, supervision, and digital safeguarding.

7.1 Online Tuition Environment

All online sessions must adhere to the following protocols:

- **Neutral Location:** Students must attend from a **neutral space** such as a living room or communal area. **Bedrooms are not permitted** as online learning environments.
 - **Parental Supervision:** A **parent/carers must check in at the start and end** of each session to confirm the student's presence and provide support if needed.
 - **Appropriate Dress and Behaviour:** Both tutors and students must wear suitable clothing and behave professionally at all times.
 - **No Recordings:** Tutors must not record, screenshot, or capture sessions unless explicitly authorised in writing by the DSL and the student's school/guardian.
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7.2 Approved Platforms and Technology Use

Tutors must only use **ABC Education-approved platforms**, such as:

- Microsoft Teams
- Zoom (with safeguarding features enabled)

- Google Meet (via secure, authorised accounts)

Use of personal email, messaging apps, or social media to contact students is strictly prohibited.

Tutors may only use devices with appropriate virus protection and updated software. Sessions must be conducted via secure internet connections and in environments free from distractions or background noise.

Tutors will follow the DfE guidance on generative AI in education when configuring platforms for student use.

7.3 Communication Expectations

Tutors must:

- Only communicate with students through official channels approved by ABC Education
- Ensure all communications include a parent/carer or ABC staff member where appropriate
- Maintain professional language and tone in all interactions
- Not share personal phone numbers, social media accounts, or private contact details

All communication with children must be **transparent, traceable, and professional**.

7.4 Safeguarding During Online Sessions

Tutors must remain vigilant to any signs of distress, abuse, or unusual behaviour during online sessions. This includes:

- Withdrawal or reluctance to speak
- Verbal disclosures
- Inappropriate clothing or background environment
- Other people being present off-screen or directing the student

If anything gives cause for concern, tutors must **immediately report to the DSL** using the Safeguarding Concern Form.

7.5 Digital Security, Filtering, and Monitoring

Although ABC Education delivers learning remotely, we recognise our responsibility to ensure **platforms are secure and appropriate**.

We:

- Regularly review the security of all digital platforms used
- Recommend filtering and monitoring tools for students accessing sessions from home
- Maintain logs of tutoring activity, incidents, and communication where appropriate
- Ensure parents are supported in understanding online safety

Tutors must report any breaches of digital security or misuse of technology to the DSL or technical support team immediately. Staff should be alert to harms from misinformation, disinformation and conspiracy theories.

Further information: <https://www.ceopeducation.co.uk/>

7.6 Online Safety Education for Students

Tutors are expected to embed online safety messages within their sessions when appropriate. Students are supported to:

- Understand the risks of sharing personal information online
- Report harmful or inappropriate content
- Recognise manipulation, grooming, or pressure online
- Develop digital resilience and confidence

8. Reporting Concerns and Disclosures

ABC Education maintains a **culture of vigilance**, where all staff and tutors understand that **no concern is too small to report**. Prompt reporting can prevent harm, enable early intervention, and support the best outcomes for children.

8.1 General Principles

- **All staff and tutors must report any safeguarding concern or disclosure without delay.**
- You do **not need proof**—concerns can be based on gut feeling, observation, a student's behaviour, or something seen/heard online or in person.

- You must **not investigate**, confront the alleged individual, or promise confidentiality to a student.
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8.2 How to Report a Concern

Step 1: Record your concern in writing using the **Safeguarding Concern Form** on TutorCruncher.

This must include:

- Factual description of what was seen, heard, or disclosed
- Date, time, and names of those involved
- Exact words used by the child where possible
- Your name, role, and contact details

Step 2: Submit your completed form to the Designated Safeguarding Lead:

 **Email:** safeguarding@abctutoring.co.uk 24/7

 **Phone (Office Hours):** 01420 610 147

If you believe a child is in **immediate danger**, call **999** first, then inform the DSL.

Please remember: UK GDPR/ DPA do NOT prevent sharing information for safeguarding. If in doubt speak to the DSL. Fears about sharing information must not stand in the way of Safeguarding.

8.3 Responding to a Child's Disclosure

If a child discloses abuse:

Do:

- Listen calmly and attentively
- Reassure the child they've done the right thing
- Take the disclosure seriously
- Record their exact words—do not paraphrase
- Explain what will happen next in age-appropriate terms

Do Not:

- Promise confidentiality

- Ask leading or multiple questions
- Express shock or judgement
- Investigate or confront anyone involved

Use language like:

“Thank you for telling me. I believe you. I’m going to speak to someone who can help keep you safe.”

8.4 Actions by the DSL or Deputy DSL

Upon receiving a concern, the DSL will:

1. **Review the Safeguarding Concern Form**
2. **Liaise with parents/carers**, unless doing so puts the child at further risk
3. **Refer to Children’s Social Care or the Police**, if threshold for significant harm is met
4. **Liaise with the child’s school** (if on roll), as per multi-agency procedures
5. **Record all actions and decisions**, including rationale for referrals or non-referrals

All referrals are made within **24 hours** of the concern being raised—or **immediately** if the child is at risk.

8.5 When to Refer to Local Authorities

The DSL will refer a case to **Children’s Services** if there is:

- Reasonable cause to suspect a child is suffering or likely to suffer significant harm (*Section 47*)
- The child needs additional support (*Section 17*)
- Concerns around sexual exploitation, county lines, FGM, or radicalisation

The **Local Authority Designated Officer (LADO)** will be informed of any **allegation against staff or tutors**.

8.6 Confidentiality and Information Sharing

- All concerns and records are kept **confidential and securely stored**.

- Information is shared **on a need-to-know basis only**, and always in line with UK GDPR and safeguarding legislation.
 - Safeguarding overrides GDPR—if a child is at risk, staff must share information lawfully and promptly.
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8.7 Thresholds and Escalation

If a staff member or tutor is concerned that a report **is not being taken seriously** or action is not being taken, they must:

1. Escalate to a Company Director
2. Consider using the **Whistleblowing Procedure** (see Section 10)

9. Allegations Against Staff, Tutors or Volunteers

ABC Education takes all allegations against staff, tutors, volunteers, and contractors extremely seriously. We have a legal and moral responsibility to ensure that children are protected from harm, including harm caused by those working with them.

This section outlines how we respond to concerns that a member of staff may have:

- **Behaved in a way that has harmed a child or may have harmed a child**
 - **Possibly committed a criminal offence against or related to a child**
 - **Behaved in a way that indicates they may pose a risk of harm to children**
 - **Behaved in a way that raises doubts about their suitability to work with children**
(including behaviour outside of work, as per *KCSIE 2025*)
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9.1 Immediate Actions

If a staff member or tutor is accused of the above:

- The company will consider suspension only where necessary – (Suspension is not an automatic response. The decision to suspend will be considered only where there is cause to suspect a child is at risk of harm, or the case is so serious it might be grounds for dismissal. The DSL/Directors will consult with the LADO before any decision to suspend is made, and alternatives will always be considered.)

- The **DSL or Company Director** will conduct an initial safeguarding risk assessment and determine whether the threshold for LADO referral is met and consider alternatives (e.g. Supervised duties)
- Where required, a referral will be made to:
 - The **Local Authority Designated Officer (LADO)**
 - **Children's Services**
 - **Police** (if a criminal offence may have occurred)
- The accused individual will be informed of the allegation but not provided with full details until appropriate (to avoid compromising investigation).

All actions, communications, and outcomes will be recorded securely.

9.2 Local Authority Designated Officer (LADO)

The LADO is responsible for managing allegations against adults working with children. ABC Education will refer cases to the relevant LADO within **one working day** of the concern being raised, regardless of whether the individual is employed, contracted, or volunteering.

Referral is made if the individual:

- May have harmed a child
- May pose a future risk to children
- Has behaved inappropriately either on or off duty

We cooperate fully with the LADO, police, and safeguarding partners during investigations.

9.3 Investigation and Outcomes

Following a LADO consultation, outcomes may include:

- **Substantiated** – allegation supported by evidence
- **Unsubstantiated** – not enough evidence to prove or disprove
- **Unfounded** – proven to be false
- **Malicious** – deliberately false or intended to harm

Where appropriate, disciplinary action may follow (up to and including dismissal), regardless of criminal outcomes.

If a tutor or staff member resigns or ceases working during the investigation, this does **not prevent an investigation or LADO referral**. A full record will be kept, and a **referral to the DBS** will be made if the individual is removed or would have been removed had they not resigned.

9.4 Support for Staff and Children

We recognise that allegations are distressing. ABC Education ensures:

- **Support for the child(ren)** involved
 - **Pastoral and professional support for the staff member** (including access to wellbeing resources and a named contact)
 - **Clear communication and updates** for those involved, in line with confidentiality and procedural fairness
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9.5 Recordkeeping

- All allegations are recorded in a confidential file, separate from the staff member's personnel record.
 - These are retained in line with statutory retention guidance and for potential future disclosure to the DBS, LADO, or legal entities.
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9.6 Allegations Found to Be False or Malicious

If an allegation is found to be deliberately false:

- The DSL will refer the matter to Children's Services if the child may need support.
 - No record will be kept on the staff member's file if the allegation was clearly unfounded or malicious.
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9.7 Referral to the Disclosure and Barring Service (DBS)

ABC Education has a legal duty to refer to the DBS any individual who has:

- Harmed or posed a risk of harm to a child

- Been removed from working (or would have been had they not resigned) due to safeguarding concerns

This ensures individuals who are a risk to children are **barred from working in regulated activity**.

10. Low-Level Concerns

At ABC Education, we promote a culture where all concerns about adults working with children—no matter how small—are recognised, recorded, and acted upon appropriately.

A **low-level concern** is any concern—no matter how minor—that an adult working with children may have acted in a way that:

- **Is inconsistent with the Staff Code of Conduct**, including inappropriate language, breaches of boundaries, or tone
- **Does not meet the threshold for LADO referral**
- May make a child or adult feel **uncomfortable, confused, or uncertain**
- Could become more serious if left unaddressed

These behaviours may be unintentional, but **still require reflection, review, and documentation**.

10.1 Why Low-Level Concerns Matter

- Low-level concerns help identify patterns of behaviour early
- They promote transparency, accountability, and professional curiosity
- They demonstrate that safeguarding is embedded in day-to-day practice
- They support safer organisational culture and early correction

As outlined in **KCSIE 2025**, failing to report a low-level concern could mean missing the opportunity to prevent harm.

10.2 Examples of Low-Level Concerns

- Being over-familiar with a student (e.g. using pet names, nicknames)
- Inappropriate jokes, language, or banter

- Texting outside professional hours
 - Inconsistent boundaries (e.g. favouritism or special treatment)
 - Sharing too much personal information with a student
 - Standing or sitting too close without cause
 - Giving or accepting gifts inappropriately
 - Not addressing inappropriate student comments or behaviour
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10.3 How to Report a Low-Level Concern

Low-level concerns must be reported to the **DSL or a Director** as soon as possible, using the **Low-Level Concern Log**, or via email if more appropriate.

You do **not** need to be certain of wrongdoing—simply report what you observed or are unsure about.

Reporting a low-level concern is a sign of professionalism, not disloyalty.

10.4 DSL Actions Following a Low-Level Concern

The DSL will:

1. Review the concern and assess its nature
 2. Consult with a Director if escalation is needed
 3. Determine whether the concern remains low-level, or whether:
 - It indicates a **pattern of behaviour**
 - It requires referral to the LADO or disciplinary action
 - It reflects a **training or supervision need**
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10.5 Recordkeeping and Storage

- All low-level concerns are logged, even if no further action is taken
- Records are stored securely, separate from personnel files
- They are retained **at least until the individual leaves employment or contract with ABC Education**

Patterns will be reviewed regularly to identify risks or support needs.

10.6 Responding to Patterns or Repeat Concerns

If multiple low-level concerns are recorded about the same individual:

- A reflective meeting may be arranged to address expectations
- A supervision or support plan may be developed
- Escalation to the LADO will occur if the **threshold for risk of harm** is reached

11. Whistleblowing and Escalation

ABC Education is committed to creating a culture where all staff, tutors, and contractors feel safe to raise concerns about wrongdoing, poor practice, or safeguarding failures—without fear of reprisal.

All staff have a professional duty to report concerns about:

- Unsafe or harmful behaviour by a colleague or leader
- Poor safeguarding practice or repeated failure to follow procedures
- Concerns not acted upon appropriately by the DSL, DDSL, or Directors
- Attempts to conceal safeguarding issues or prevent disclosure

We want to be a **learning organisation**, not a punitive one. Speaking up early helps prevent harm and allows reflection and improvement.

11.1 What Is Whistleblowing?

Whistleblowing is when someone reports suspected wrongdoing or malpractice in the workplace, especially where a child or vulnerable person may be at risk of harm.

This could include:

- Safeguarding failures or cover-ups
 - Inappropriate relationships with students
 - Bullying, harassment, or discrimination
 - Conflicts of interest or abuse of power
 - Neglect of professional responsibilities
 - Corruption, fraud, or financial misconduct
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11.2 How to Raise a Whistleblowing Concern Internally

You can raise concerns confidentially and without prejudice by contacting:

Claire McAvoy (Director and DSL)

 safeguarding@abctutoring.co.uk

 01420 610 147

Alicia Buckle (Deputy DSL / Director)

 safeguarding@abctutoring.co.uk

You do **not** need to prove wrongdoing—just explain what you’ve seen, heard, or suspect. Concerns can be raised verbally or in writing and will be handled discreetly and respectfully.

11.3 External Whistleblowing Options

If you feel unable to raise your concern internally, or if your concern has not been handled appropriately, you can contact:

NSPCC Whistleblowing Advice Line

 0800 028 0285

 help@nspcc.org.uk

 www.nspcc.org.uk/whistleblowing

You can also report concerns to:

- **Ofsted**
 - **The Local Authority Designated Officer (LADO)**
 - **The Police** (if a criminal offence is suspected)
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11.4 Protection from Reprisal

In line with the **Public Interest Disclosure Act 1998**, whistleblowers are legally protected against dismissal or retaliation. Any form of intimidation or discrimination against a whistleblower will result in disciplinary action.

11.5 Recording and Response

All whistleblowing reports are:

- Logged confidentially by the DSL or Directors

- Investigated promptly
- Documented with outcomes and actions
- Reviewed during annual safeguarding audits

Where necessary, concerns may be escalated to external agencies to protect children and uphold ethical practice.

12. Children Who May Be Particularly Vulnerable

At ABC Education, we recognise that **some children are more vulnerable to abuse and harm than others**. These children may require additional support, closer monitoring, and more proactive safeguarding approaches.

All staff and tutors must maintain heightened awareness of the additional risks faced by children in the following groups:

12.1 Children with Special Educational Needs and Disabilities (SEND)

Children with SEND may:

- Struggle to communicate experiences of harm
- Be more dependent on adults for care and support
- Be isolated from peers
- Be misunderstood or mislabelled due to behaviours that mask abuse

Tutors must:

- Be aware that challenging behaviour may be a sign of distress or trauma
- Use adapted communication methods to help students express concerns
- Ensure additional time and support are offered during disclosures or safeguarding conversations
- Ensure appropriate use of terminology “autism” or “autistic child/young person” which aligns with the SEND Code of Practice.^{4.1}

12.2 Children with Mental Health Needs

Mental health challenges can be:

- **A symptom of abuse or neglect**
- **A risk factor for exploitation or grooming**

- **Exacerbated by online pressures, trauma, or bullying**

Tutors must:

- Recognise signs of poor mental health (e.g. withdrawal, self-harm, anxiety, disordered eating)
 - Report concerns even if there's uncertainty about cause
 - Embed emotional wellbeing support into learning environments
 - Be aware of the link between **safeguarding and mental health**, as emphasised in KCSIE 2025
-

12.3 Children Who Are LGBTQ+ or Exploring Gender Identity

LGBTQ+ children may face:

- Increased risk of bullying, exclusion, or rejection
- Difficulty in accessing support due to fear of judgement
- Exploitation or manipulation based on identity

ABC Education creates **inclusive, affirming environments** where all identities are respected. Tutors must:

- Use inclusive language
 - Avoid assumptions
 - Report any form of discriminatory behaviour or bullying immediately
-

12.4 Children in Care or Care Leavers

Children looked after by the local authority, or those recently in care, may:

- Have experienced abuse, neglect, or repeated trauma
- Struggle with attachment, regulation, or trust
- Require coordinated multi-agency support

Tutors must work with designated teachers, Virtual Schools, and social workers to align support and share relevant safeguarding information.

12.5 Children Living in Poverty or Unstable Housing

Poverty can increase safeguarding risks such as:

- Neglect
- Exploitation
- Exposure to domestic abuse or criminality
- Difficulty accessing health, food, or support services

Tutors should be alert to signs such as:

- Poor hygiene
- Hunger
- Frequent moves between accommodations
- Gaps in education or engagement

12.6 Children Missing Education (CME)

Children who go missing from education are **at increased risk of:**

- Abuse
- Exploitation
- Mental health decline
- Radicalisation or gang involvement

If a student is absent without explanation for more than 10 consecutive days or repeatedly disengaged from learning:

- Tutors must notify the Client Liaison Team and DSL
- Efforts to contact the family must be documented
- If risk is suspected, a **referral to the local authority** must be made immediately

We shall follow the Statutory guidance “Working together to improve school attendance” - [Working together to improve school attendance \(applies from 19 August 2024\)](#) and ABC Education will record escalations and inform the LA without delay where risk is suspected.

12.7 Children at Risk of Exploitation or Radicalisation

Tutors must be alert to grooming behaviours and risk indicators of:

- **Child Sexual Exploitation (CSE)** - A form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something (e.g., gifts, money, status) and/or for the perpetrator's advantage; the child may appear to consent, but it is not free consent.
<https://www.childrenssociety.org.uk/information/professionals/resources/child-exploitation-language-guide>
- **Child Criminal Exploitation (CCE) and County Lines** – Where a child is exploited into criminal activity (often through coercion, control, manipulation or deception).
- **Radicalisation** “The process of a person legitimising support for, or use of, terrorist violence” (Prevent Duty)
- **Extremism** “The promotion or advancement of ideology based on violence, hatred or intolerance” that aims to negate/destroy others’ fundamental rights and freedoms, or undermine/replace the UK’s Liberal parliamentary democracy and democratic rights, or intentionally create a permissive environment for others to achieve those aims. (Prevent Duty)

Red flags may include:

- Unexplained gifts or money
- Secretive or aggressive behaviour
- Withdrawal from family or friends
- Obsession with ideology, conspiracy theories, or extremist views

Report any such concerns to the DSL immediately.

13. Recordkeeping, Information Sharing, and Confidentiality

Maintaining high-quality, secure, and confidential safeguarding records is essential to protecting children and ensuring accountability. ABC Education is committed to recording safeguarding concerns accurately, sharing information responsibly, and meeting all data protection requirements.

13.1 Safeguarding Recordkeeping

All concerns, disclosures, and actions must be **clearly recorded** using the appropriate safeguarding forms and reporting templates.

Each record must include:

- Date and time of the concern or disclosure
- Name and details of the child (and others involved, where relevant)
- Factual account of what was said or observed
- Any action taken and rationale for decisions
- Name and signature of the person reporting

Never assume that a concern is too small to document. A single record may contribute to a bigger picture.

13.2 Storage and Security of Records

- Safeguarding records are stored **digitally** in a secure, access-restricted system managed by the DSL.
 - Records are stored **separately from general pupil files or HR files.**
 - Paper records (if used temporarily) are transferred to digital storage and then destroyed securely.
-

13.3 Duration of Retention

In accordance with best practice and legal guidance:

- Safeguarding records are retained **until the child's 25th birthday** (or longer if required for legal purposes).
 - If a referral is made to external agencies (e.g. police, LADO, children's services), records are retained indefinitely or as advised by statutory partners.
-

13.4 Information Sharing

Safeguarding overrides GDPR where a child is at risk of harm. **Staff must share information to protect children** in accordance with *KCSIE 2025* and the government's *Information Sharing Advice for Practitioners*.

Key principles:

- Share only what is necessary for the purpose
- Share with the appropriate person or agency
- Be open with the child and parents unless doing so puts the child at greater risk
- Keep a written record of what was shared, with whom, and why

“Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”

(KCSIE 2025)

13.5 Access to Records

Access to safeguarding records is limited to:

- Designated Safeguarding Lead (DSL)
- Deputy DSL
- Directors (where appropriate)
- Regulatory authorities or statutory agencies when legally required

Requests from other parties are reviewed on a case-by-case basis and must comply with GDPR and safeguarding protocols.

13.6 Confidentiality

- Safeguarding records and conversations must be treated with the **strictest confidentiality**.
- Information must not be shared informally or discussed outside the reporting process.
- Staff must never promise confidentiality to a child—**only that the concern will be shared with someone who can help**.

14. Policy Governance, Review, and Accessibility

14.1 Governance and Oversight

The Directors of ABC Education Limited hold overall responsibility for ensuring that safeguarding is embedded across all areas of the organisation. The DSL is responsible for day-to-day implementation and monitoring of safeguarding practice.

The Directors ensure:

- Appointment of a trained, qualified Designated Safeguarding Lead (DSL)
 - Allocation of resources to support safeguarding delivery and staff training
 - Scrutiny of safeguarding records, incidents, and trends
 - Oversight of safer recruitment and whistleblowing procedures
 - Annual review and approval of the safeguarding policy and procedures
-

14.2 Policy Review

This policy is reviewed:

- **At least annually**
- **Following significant safeguarding incidents**
- **In response to changes in legislation** (e.g. updates to KCSIE)
- **Upon request from DSLs, Directors, or statutory agencies**

The review process includes:

- Consultation with staff, tutors, and partner schools
- Review of incidents, trends, and audit findings
- Incorporation of new statutory guidance and good practice

The next scheduled review will take place by: **1st April 2026**

14.3 Accessibility and Availability

- This policy is shared with all new staff and tutors at induction
 - It is available on request in **digital** and **print-friendly** formats
 - Accessible versions (e.g. large print, translated, or audio) are available to staff, families, or young people where needed
 - Partner schools and commissioning authorities are provided with the latest approved version
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14.4 Approval and Sign-Off

This policy has been reviewed and approved by the Directors of ABC Education Limited:

Claire McAvoy*Company Director & Designated Safeguarding Lead*

Signed: C. McAvoy

Date: 01/04/2025

Allicia Buckle*Company Director & Deputy Designated Safeguarding Lead*

Signed: A Buckle

Date: 01/04/2025

Appendices:

Contact details for all safeguarding referrals from professionals.

County/Borough	Contact Information
Dorset Provided with a Pan Dorset safeguarding poster on induction and accessible on Tutor Cruncher.	<i>Professional's Telephone Number and On-Call Out of Hours Service 24/7: 01305 228558</i> <i>Bournemouth, Christchurch, Poole Children's Services First Response Hub:</i> <i>Telephone: 01202 123334</i> <i>Email: childrensfirstresponse@bcpcouncil.gov.uk</i> <i>Out of Hours Teams on: 01202 738256 or email: childrensOOHS@bcpcouncil.gov.uk</i>

Staffordshire	Please either call SCAS (Staffordshire Children's Advice and support Service) on 0800 131 3126 or complete an online enquiry form. https://www.staffordshire.gov.uk/Care-for-children-and-families/Childprotection/Report-a-concern-online.aspx Out of hours: Outside of the hours above, or on weekends and bank holidays, please contact the Emergency Duty Team by phoning 0345 604 2886.
Hampshire	Please complete an Inter-Agency Referral Form. https://childrenandfamiliesportal.hants.gov.uk/s4s/FormDetails/FillForm?formId=279 For urgent child protection enquiries, professionals can telephone: 01329 225379. Contact for IARF (Hampshire SCP): • Telephone: 01962 876355 hampshirescp.org.uk • Email: hscp@hants.gov.uk Contact MASH: ?Public phone number for concerns about a child during office hours: 0300 555 1384 Hampshire County Council Out of hours: 0300 555 1373 ? Public phone number for concerns about a child during office hours: 0300 555 1384 Hampshire County Council
West Sussex	Phone (Office Hours): 01403 229900 Website: Request support or raise a concern about a child - West Sussex County Council. Note: For urgent safeguarding concerns requiring a same-day response during office hours. In emergencies, call 999.
Reading Borough	Report or refer concerns about a child - Brighter Futures For Children If you suspect there is immediate danger call 999 first, then us 0118 937 3641, Option 1, Mon-Fri 9am-5pm and complete the CSPoA form within 24 hours of doing so. Out of hours emergency telephone: 01344 351 999 5pm to 9am, Monday to Friday and 5pm Friday to 9am Monday.
Suffolk	If you would like to discuss whether or not a referral is required, please call the Professional Consultation Line on 03456 061 499 to speak with a MASH (Multi-Agency Safeguarding Hub) social worker. Child Safeguarding Concern (MARF)
Bedford	If the child is not in immediate danger, but you're still concerned about them, please complete our 'Report a concern about a child' form and email it to IFDinformation@bedford.gov.uk. By submitting the form you agree that you have read and understood how we process your personal data. If you are a teacher or other professional, are worried about a child and would like to discuss your concerns, you can contact the IFD professional consultation line on 01234 718 211 for help and advice from a social worker.

Cambridgeshire	<i>Make a referral for a child or young person in need, or where there is reason to suspect they are likely to suffer significant harm because of abuse or neglect. Professionals can report a safeguarding concern on the Joint Peterborough and Cambridgeshire Safeguarding website (link below). There is also full supporting guidance, risk assessment tools and threshold information on the website.</i> <i>Professionals – Making a Referral Cambridgeshire and Peterborough Safeguarding Partnership Board</i>
Peterborough	<i>Make a referral for a child or young person in need, or where there is reason to suspect they are likely to suffer significant harm because of abuse or neglect. Professionals can report a safeguarding concern on the Joint Peterborough and Cambridgeshire Safeguarding website (link below). There is also full supporting guidance, risk assessment tools and threshold information on the website.</i> <i>Professionals – Making a Referral Cambridgeshire and Peterborough Safeguarding Partnership Board</i>
Nottinghamshire	<i>For any urgent concerns about a child or if you wish to report a concern anonymously, please contact us on 0300 500 80 80 (if you are a member of the public) or 0300 500 80 90 (if you are a practitioner working with the child or family in a professional capacity). Before referring, please consider whether support from the Family Service would be more appropriate. This Concerns regarding children guidance [PDF] will help you to refer to the right place and get the right support for the child and their family.</i> <i>If you are unable to report this concern to us via the form, please call 0300 500 80 90</i>
Cornwall	Complete an inter agency referral - NB you will need to save this and email it to us Email us at multiagencyreferralunit@cornwall.gov.uk Tel: 0300 123 1116
Blackburn with Darwen	- Phone (Office Hours): 01254 666400 Multi-Agency Safeguarding Hub (MASH) Blackburn with Darwen Borough Council
Blackpool	Blackpool Safeguarding Partnerships Blackpool Safeguarding Partnerships -
Bury	Bury Safeguarding Partnership Report a concern about a child - Bury Safeguarding Partnership
Cheshire	Cheshire East Safeguarding Children's Partnership ChECS - Cheshire East Children's Consultation Service
Cheshire West and Chester	Integrated Access and Referral Team (iART) or the Emergency Duty Team (EDT) Report a concern about a child Cheshire West and Chester Council

Cumberland	Cumbria safeguarding Children Partnership Child protection and safeguarding Cumberland Council
Halton Borough	Halton Safeguarding Children Partnership Home - Halton Safeguarding Children Partnership
Knowsley	Knowlsey Safeguarding Partnership Professional workers with concerns Knowsley Council
Lancashire	Multi Agency Safeguarding Hub Safeguarding children - Lancashire County Council
Liverpool	MARF Children at risk (MARF referrals) - Liverpool City Council
Manchester	The Manchester Safeguarding Partnership Report a Concern - Manchester Safeguarding Partnership
Oldham	Multi Agency Safeguarding Hub Referrals Oldham Safeguarding Children Partnership
Oxfordshire	If you have a concern about a child, please call MASH on 0345 050 7666 during office hours (8.30am – 5pm, Monday to Thursday, 8.30am – 4pm, Friday) Outside office hours call the Emergency Duty Team on 0800 833 408 If you are a practitioner and have concerns about another practitioner or volunteer who works with children, or you need to report them, you will need to contact the Local Authority Designated Officer (LADO) on 01865 810603. Find out more about the Multi-Agency Safeguarding Hub (MASH) and referral process.
Rochdale	Rochdale Borough Safeguarding Children Partnership Report a child at risk Rochdale Borough Council

Salford	Salford Safeguarding Children Partnership Professionals Salford Safeguarding Children Partnership
Sefton	Children's Health and Advice Team Sefton Safeguarding Children Partnership - Worried about a child?
St Helens Borough Council	Multi Agency Safeguarding Hub Concerned about a child's safety or welfare? - St Helens Borough Council
Stockport	MASSH Contacting the MASSH - Stockport Council
Tameside	Multi Agency Safeguarding Hub Worried about a child? - Tameside MBC
Trafford	Trafford Safeguarding Partnership Levels of Need
Warrington	MARS Report abuse of children and young people warrington.gov.uk
Westmorland and Furness	Westmorland and Furness Safeguarding Hub Westmorland and Furness Safeguarding Hub Single Contact Form
Wigan Council	Wigan Safeguarding Partnership Report concerns about a child
Wirral	Wirral Safeguarding Children Partnership Concerned about a child - Wirral Safeguarding Children Partnership

