

# The Tutors' Association

## Safeguarding and Child Protection Policy - Lone Providers

### Adopted by: Booth's Education Services & Tutoring Ltd

Person Responsible for this Policy: Charlotte Booth

Policy last updated: 1<sup>st</sup> June 2026

Next update: September 2026

#### 1. Introduction, Government Guidance and Aims

Charlotte Booth is committed to the wellbeing and safeguarding of all children, adults and staff who attend tuition with them. This policy's main aim is to provide all children and adults with a comprehensive, secure and clear commitment to safeguarding and a framework to ensure all children attending Booth's Education Services & Tutoring Ltd are protected from harm.

Under no circumstances must any BEST associated tutors use physical force as a punishment.

This policy is written with regard to:

- **Keeping Children Safe in Education (KCSIE) 2025** (statutory guidance) and its online safety framework, roles of the DSL, child-on-child abuse, and reporting expectations. [\[assets.pub...ice.gov.uk\]](#)
- **Working Together to Safeguard Children (latest)** – multi-agency responsibilities and thresholds. *(Cross-reference only; no text change needed here.)*
- **Prevent Duty Guidance (2023) for England & Wales** – due-regard duty, sector expectations for education, and referral pathways (Prevent/Channel). [\[gov.uk\]](#)
- **Information sharing: advice for practitioners (May 2024)** – lawful bases and the “seven golden rules” when safeguarding children.
- **Department for Education non-statutory guidance-** After-place of education clubs, community activities and tuition: safeguarding guidance for providers (2023) **and** What to do if you're worried a child is being abused (2015)
- **AP/CD1397 expectations for mental health support**

In addition, this setting operates in accordance with the local authority in partnership to keep children safe. Details of the local authority can be found here:

<https://suffolkscp.trixonline.co.uk/>

### [LADO — Suffolk Safeguarding Partnership](#)

EMERGENCY (Children or Adults): 999

Customer First – Children: 0808 800 4005

Customer First – Adults: 0800 917 1109

MASH Professional Consultation (Children): 03456 061 499

MASH Professional Consultation (Adults): 0345 606 1499

LADO Email: LADO@suffolk.gov.uk LADO Telephone: 0300 123 2044

Children's Online Referral Portal: Suffolk Children & Young People's

Portal Adults Online Referral Portal: Suffolk Adult Care Portal

[Lado@essex.gov.uk](mailto:Lado@essex.gov.uk)

### Safeguarding Children & Vulnerable Adults Contact Details

**24 hour protection line for children and vulnerable adults:** 0345 603 7634

Concerned about an adult? Essex social care direct: 0345 603 7630

[Report a concern about a child](#) – Essex County Council

Report a concern about a child to the Children and Families Hub on 0345 603 7627. Out of hours or bank holidays, call the emergency duty team on 0345 606 1212. E-

mail: [initialresponseteam@essex.gcsx.gov.uk](mailto:initialresponseteam@essex.gcsx.gov.uk)

**Essex Safeguarding Adult Board:** <https://www.essexsab.org.uk/>

**Essex Safeguarding Children Board:** <https://www.escb.co.uk/>

### Child Protection Concern Contact Numbers:

First Contact Team for practitioners based in **Southend** (Mon to Thurs 9am – 5:30pm and Fri 9am – 4:30pm) – 01702 215007

Initial Response Team for practitioners based in **Thurrock:** 01375 652802 or 01375 652634

**NSPCC Child Protection Helpline** – 0808 800 5000

In cases where a criminal offence has been committed or it is suspected that one has been committed, the matter must be reported immediately to the local police force using the 101 service. In an emergency this must be reported using the 999 service.

Definitions of 'significant harm' are taken from Section 47 of The Children Act (1989)

This policy must be read in conjunction with the policies below:

Health and Safety, Safer Recruitment, Behaviour Inclusion and Send, GDPR Data Protection, Complaints, CME Attendance.

It is available to all parents whose children use our settings and is available by contacting: [charlotte@essexbest.com](mailto:charlotte@essexbest.com) In addition, posters at the setting display safeguarding information for parents and children.

## 2. Policy

For the purpose of this policy, 'children' refers to any student under the age of 18 attending the setting. 'Adults' refers to parents or other responsible adults who drop off or collect their child at or from the setting.

The aims of this policy are:

- To ensure that all coming into contact with children and young people understand the importance of safeguarding and that it is everyone's responsibility
- To support any child who makes a disclosure of abuse
- To ensure everyone at [name] knows who to inform in the event of a disclosure, concern or safeguarding issue and to ensure they are alert to the signs of possible child abuse
- To aid everyone at Booth's Education Services & Tutoring Ltd. in understanding and recognising specific safeguarding concerns
- To ensure, in accordance with The Children Act 1989, that the welfare of the child is paramount at all times

### 2B. Designated Safeguarding Lead

The Designated Safeguarding Lead is: Charlotte Booth

- Job Title: Director and Principal Tutor
- Contact Details: [charlotte@essexbest.com](mailto:charlotte@essexbest.com); 07863344999

The role of the Designated Safeguarding Lead (DSL) is to:

- Be a point of advice on safeguarding and pastoral issues
- Have overall responsibility for safeguarding (this cannot be delegated)
- Raise awareness of safeguarding amongst those attending the setting
- Manage referrals from to the local authority
- Manage the record-keeping of safeguarding concerns and ensure records are kept up to date
- To update their own Level 3 safeguarding training at least once every two years using an external provider including Online Safety training and Prevent training
- Make referrals to the local authority Prevent Officer under the Counter-Terrorism and Security Act 2015

All colleagues must maintain a professional curiosity and the stance that **'it could happen here'**. In addition to physical, emotional, sexual abuse and neglect, all staff must be able to recognise and act on all types of Exploitation; FGM; Prevent and Radicalisation; Mental Health; Child on Child Abuse; Online Safety risks.

### 3. Safeguarding Matters

For further details and definitions of types of abuse and neglect, we can reference DfE guidance *Working Together to Safeguard Children (2023)* and *Keeping Children Safe in Education (2025)*. External training will also reference these documents including definitions of abuse and neglect.

#### 3.1 Recognising concerns - signs and indicators of abuse, neglect and exploitation.

All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the place of education/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All place of education and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, but especially the designated safeguarding lead should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

**In all cases, if staff are unsure, they should always speak to the DSL directly and without delay.**

#### **Indicators of abuse and neglect**

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

The following indicators listed under the categories of abuse are not an exhaustive list:

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

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

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

(Source [Keeping children safe in education 2025](#))

### 3.2 Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as of drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines) radicalisation and consensual and non-consensual sharing of nude

and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

### **Child-on-child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of place of education and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there no reports in place of education it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy) and record these using the place of education/college's safeguarding system. (See appendix)

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi nude images and or videos<sup>1</sup> (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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<sup>1</sup> UKCIS guidance: Sharing nudes and semi-nudes advice for education settings.

All colleagues should be clear about the place of education's policy and procedures with regards to child-on-child abuse and the important role they must play in preventing it and responding where they believe a child may be at risk from it. (See *BEST Safeguarding Appendix*)

### **Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)**

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

### **Child Criminal Exploitation (CCE)**

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

### **Child Sexual Exploitation (CSE)**

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

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

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

Further information on signs of a child's involvement in sexual exploitation is available in [Child sexual exploitation: definition and guide for practitioners - GOV.UK](#)

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That's abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **Female Genital Mutilation (FGM)**

Whilst all staff should speak to the DSL (or deputy) regarding any concerns about FGM, there is a specific legal duty on teachers<sup>2</sup>. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Mental Health**

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

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

Staff can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the place of education's policy, and speaking to the DSL or a deputy.

(See BEST Mental Health and Well-Being policy)

### **Serious violence**

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

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<sup>2</sup> Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at place of education and other institutions in England)

## Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a place of education's or colleges safeguarding approach. For further information see Page 157 of Keeping Children Safe in Education 2025.

### Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. For further information see Page 158 of Keeping Children Safe in Education 2025

## 3.3 Children potentially at greater risk of harm

The governing body/proprietor recognises that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, in some cases, these children may find it difficult to communicate what is happening to them.

### ***[Alternative Provision]***

Where a place of education places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. Booth's Education Services & Tutoring Ltd will liaise with the students' schools and local authority case workers.

We recognise that the cohort of pupils in alternative provision often have complex needs and are aware of the additional risk of harm our pupils may be vulnerable to.

Booth's Education Services and Tutoring will have regard to the following statutory guidance:

Arranging Alternative Provision - guide for LAs and Schools and [Education for children with health needs who cannot attend place of education – DfE Statutory Guidance](#)

### **Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to complex safeguarding or welfare needs. Children may need this help due to abuse, neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Booth's Education Services & Tutoring expects that the Local Authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this

information under existing duties on both LAs and place of education to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **Children absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- . Are at risk of harm or neglect
- . Are at risk of forced marriage or FGM
- . Come from Gypsy, Roma, or Traveller families
- . Come from the families of service personnel
- . Go missing or run away from home or care
- . Are supervised by the youth justice system
- . Cease to attend a place of education
- . Come from new migrant families

It is important that the place of education's procedures for unauthorised absence and for dealing with children who are absent from education are followed, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to LA children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where absence from education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the place of education's unauthorised absence procedures and children missing education procedures. (See BEST CME and Attendance Policy)

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

Further information and support include:

- place of education's duties regarding children missing education, including information place of education **must** provide to the LA when removing a child from the place of education roll at standard and non-standard transition points can be found in the DfE's statutory guidance: [Children Missing Education - Guidance](#)
- General information and advice for place of education's can be found in the Government's [Missing Children and Adults Strategy](#).

- further information for colleges providing education for a child of compulsory place of education age can be found in: [Full-time enrolment of 14- to 16-year-olds in further education and sixth-form colleges: 2025 to 2026 academic year - GOV.UK](#)
- guidance for place of educations concerning children who are absent from education [Working together to improve place of education attendance](#)

### **Children requiring mental health support**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The governing body/proprietor will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system. (See *BEST Mental Health and Well-Being Policy*)

Staff can access further advice in a DfE guidance documents [Preventing and tackling bullying](#) and [mental health and behaviour in place of educations](#) which set out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole place of education approach to social and emotional wellbeing, which is tailored to the needs of pupils.

### **Looked after children and previously looked after children.**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The governing body/proprietor will ensure staff have the skills, knowledge and understanding to keep looked after children safe.

Booth's Education Services & Tutoring, Ltd. will ensure there are arrangements in place so that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual place of education head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. The governing body/proprietor recognise that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

For children who are care leavers, the DSL should have details of the LA Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern.

**Children with SEN and disabilities, or health issues** can face additional safeguarding challenges, both online and offline.

Colleagues should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration.

Colleagues should also be aware that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Similarly, staff should be aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Colleagues also need to be mindful of children's cognitive understanding, for example, whether they can understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in place of education.

As such, any reports of abuse involving children with SEND will require close liaison with the DSL and the local authority Key Worker.

Further information can be found in the DfE's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at Place of education with Medical Conditions](#)
- [Children with special educational needs and disabilities \(SEND\) | NSPCC Learning](#)
- [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#)

## **Children who are lesbian, gay, bisexual, or gender questioning**

***Revised guidance on gender questioning children is expected this summer. If published, we will signpost to this guidance in September 2025.*** In the absence of confirmed guidance the following guidance is available [GQC Draft Guidance — Trans and Non-Binary Education](#)

Booth's Education Services & Tutoring Ltd acknowledges that the fact that a child or young person may be lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm. However, children who are lesbian, gay, bisexual or gender questioning can be targeted by other children. In some cases, a child who is perceived to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who are.

Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. Staff should therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

## d. Additional considerations:

### D.1 Mental Health Lead

#### **Mental Health Lead and Licensed Thrive Practitioner**

**Name:** Charlotte Booth

**Role:** Mental Health Lead and Director

**Organisation:** Booth's Education Services & Tutoring Ltd

**Email:** *charlotte@essexbest.com*

**Phone:** 07863344999

As a sole provider, I act as the **Mental Health Lead** for all tuition and mentoring activities. I am responsible for co-ordinating, early intervention, embedding a culture that values mental health equally with physical health, according to DfE and NHS guidance.

I am responsible for the adequate training of colleagues to recognise and act upon concerns for the mental health, well-being and safeguarding of all children/ young people in our provision and all colleagues. As a collective, we will value student voice and participation and interaction with parents/ carers.

#### **As Thrive Practitioner:**

- Lead the emotional-development model of Thrive sessions, using relational safety, co-regulation and developmental repair approaches.
- Conduct Thrive assessments and create personalised action plans aligned with SEMH needs.
- Ground well-being in attachment-aware, trauma-informed practice.
- Use neuro-developmental and relational frameworks to understand behaviours.

**See Policy: Mental Health and Well-Being** (New Feb 2025)

### D.2 Online Safety Lead

#### **Online Safety Lead**

**Name:** Charlotte Booth

**Role:** Online Safety Lead (OSL) and Director

**Organisation:** Booth's Education Services & Tutoring Ltd

**Email:** *charlotte@essexbest.com*

**Phone:** 07863344999

As a sole provider, I act as the **Online Safety Lead (OSL)** for all tuition and mentoring activities. I am responsible for ensuring that online safety is embedded throughout my professional practice and that all reasonable steps are taken to safeguard children when digital technology is used.

## Role and Responsibilities of the Online Safety Lead

The Online Safety Lead is responsible for:

### 1. Oversight of Digital Safeguarding

- Monitoring and promoting safe and appropriate use of IT and online platforms.
- Ensuring all online learning environments align with statutory guidance (KCSIE 2025).
- Evaluating digital risks across the four key categories:
  - **Content** (illegal/inappropriate/harmful content — including misinformation, disinformation and conspiracy theories).
  - **Contact** (harmful interaction with others — including grooming, cyber-bullying, coercion).
  - **Conduct** (behaviours that increase the likelihood of harm — including sharing nudes/semi-nudes).
  - **Commerce** (online gambling, inappropriate advertising, phishing and financial scams).

### 2. Management of Online Sessions

- Ensuring only secure, GDPR-compliant platforms (e.g., Teams/Zoom) are used.
- Ensuring cameras remain on during 1:1 sessions to uphold safeguarding expectations.
- Ensuring parents are aware of session expectations, boundaries, and reporting procedures.
- Maintaining safe digital record keeping and password-protected storage.

### 3. Training & Professional Development

- Completing annual safeguarding refreshers.
- Holding Level 2 certificates in:
  - **E-Safety / Online Safety**
- Remaining up-to-date with online safety concerns, trends, and risks identified by organisations such as the UK Safer Internet Centre and NSPCC.

## 4. Responding to Online Safety Concerns

- Taking immediate action where harmful online content, interactions, or behaviours are identified.
- Logging all online safety concerns and following safeguarding reporting procedures.
- Liaising with parents, place of educations, or external professionals where appropriate.
- Reporting to MASH or police where significant risk is identified.

## 5. Ongoing Awareness

- Promoting safe behaviour online as part of tuition.
  - Supporting pupils to recognise:
    - Online grooming
    - Coercion, radicalisation or extremist content
    - Cyberbullying
    - Sharing of inappropriate images
    - Financial/commerce scams
- 

## D3 Allegations Against Staff

### Procedures for Managing Allegations Against Staff

This procedure applies to any allegation that a tutor, volunteer, contractor, or any adult working within my provision has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child in a way that indicates they may pose a risk of harm; or
- Behaved in a way that may indicate unsuitability to work with children.

As a sole practitioner, this process refers to **allegations made about me**, and the steps taken to ensure transparency, accountability, and compliance with statutory guidance.

### 1. Initial Response

All allegations will be taken seriously, recorded immediately, and responded to without delay. I will not investigate the allegation myself. Low-level concerns are logged and reviewed by the DSL/ Director.

If an allegation is made, or if I become aware of information that may constitute an allegation, I will:

1. **Record the concern** (date, time, factual detail).
2. **Cease all contact** with the child until advice is taken.
3. **Contact the Local Authority Designated Officer (LADO)** *within 1 working day*.
4. If a criminal offence may have occurred, contact **Police 101** or **999** in an emergency.

## 2. Local Authority Designated Officer (LADO) Referral

Where an allegation meets the threshold, I will refer directly to (within 1 working day):

### Suffolk LADO Service

The LADO will determine:

- Whether further action is needed
- Whether the threshold for a strategy meeting is met
- Whether suspension of duties is required
- Whether the matter should be referred to police

All instructions from the LADO will be followed in full.

## 3. Referral to DBS or Teaching Regulation Agency (TRA)

If the allegation is **substantiated** and indicates that I may be unsuitable to work with children, I will:

### Mandatory Referrals

- Refer myself (or the organisation makes a referral if applicable) to the **Disclosure and Barring Service (DBS)** under statutory duty.
- Where relevant, refer to the **Teaching Regulation Agency (TRA)** regarding possible **prohibition from teaching**.

This will be done at the advice of the LADO and in line with statutory obligations.

## 4. Record Keeping

- All records relating to allegations will be retained securely.
- Records will be kept **separately from teaching files**, held confidentially, and stored in accordance with GDPR.
- Files will be retained until at least the recommended statutory period expires.

## 5. Duty of Candour

As a sole provider, I commit to full openness, transparency, and cooperation with any investigation conducted by:

- LADO

- Police
- Social care
- DBS
- TRA
- Education providers commissioning my services

## 6. Support for Children and Families

Where an allegation is made:

- Children will be signposted to appropriate pastoral or safeguarding support through their place of education or social worker.
- Parents or carers will be informed of concerns unless advised otherwise by LADO or police.

## 7. Malicious or Unfounded Allegations

Where an allegation is found to be intentionally false or malicious:

- I will record the outcome clearly.
  - I will consider whether the child requires additional help or early intervention.
  - No disciplinary action will be taken against the child.
- 

## E. Children with Additional Educational Needs, Disabilities and other vulnerabilities

Booth's Education Services & Tutoring Ltd. Colleagues are aware that children with Additional Educational Needs, disabilities or health issues may face additional safeguarding issues. We are vigilant to:

- Any indicators of possible abuse not in keeping with the child's additional needs or history
- Any communication challenges the child faces in disclosing the abuse (for example, if the child is non-verbal)
- The fact that children with additional needs or other vulnerabilities are disproportionately impacted by abuse and behaviours such as bullying
- That children who are (or are perceived to be) lesbian, gay, bisexual or trans are more likely to suffer child on child abuse and are more vulnerable to abuse

### E2: Reporting Concerns about a child

Booth's Education Services & Tutoring Ltd. are aware that barriers to reporting abuse exist, and that some children may not be ready or not know how to tell someone that they are being abused. We are aware that children with Additional Educational Needs or disabilities

are more vulnerable to abuse. We never assume that an issue has been reported or disclosed by another person.

If a child discloses abuse:

- We will stop and listen straight away without delay
- We will write notes as soon as possible after the conversation
- We must not guarantee confidentiality
- We use TED – Tell me, Explain to me, Describe to me. We can ask children whether they have been harmed and the nature of that harm, without asking leading questions.
- We will not conduct our own investigation but will refer immediately
- We will maintain a calm and professional attitude and prioritise the wellbeing of the child at all times.

Reports to the local authority children's safeguarding board must be undertaken:

- As soon as possible and within 2 hours of the concern being raised or suspected
- For a child at risk or suspected to be at risk of significant harm, the concern must be raised immediately
- In person or by telephone as required by local services.

We note that it is usually best practice to share concerns with parents/ carers. However, for children at risk of significant harm (or where there is reasonable cause to suspect this), it may not be appropriate to do so. Decisions on whether to share information must be made in conjunction with the DSL. It may be helpful to refer to the following guidance:

- <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

The DSL will decide if a concern should be raised with the local authority. If a child is at risk of significant harm, in accordance with Section 47 of The Children Act (1989), statutory child protection agencies will conduct the investigation and the DSL must not investigate. At all times, decision-making in this regard must be documented, including:

- Who raised the concern (include details of date, time, job title)
- Who was the concern raised about (include details of child's name, date of birth, address, place of education)
- What decision was made and why – what were the reasons for making the referral
- Who was consulted
- What action was taken
- Whether parents/ carers were consulted and if not, why not

## F: Ongoing Staff Training, Monitoring & Supervision

### F1 Induction

- Before tutoring starts: read/sign Safeguarding Policy, Online Safety, Code of Conduct, Data Protection; provide DBS details; complete mandatory e-learning (Safeguarding L2/L3, Prevent, FGM, Online Safety, GDPR, H&S).

### F2 Mandatory training & refresh (*minimum standards*)

- **Safeguarding (L2/L3): every 2 years, with annual updates.**
- **Prevent (incl. Channel awareness): every 2 years.**
- **FGM awareness: every 2 years** (plus mandatory reporting reminders annually).
- **Online Safety: every 1–2 years.**
- **GDPR/Data Protection & H&S: every 2 years**, with incident-led refreshers as needed.

BEST keeps a **Training Matrix** and copies of certificates; evidence available to commissioners on request.

### F3 Supervision framework

- **Sole practitioner:**
  - **Monthly reflective self-supervision** using the BEST template;
  - **Quarterly external safeguarding supervision/consultation** with a suitably qualified professional;
  - **Case supervision** after any significant incident (within 5 working days).
- **If/when associate tutors are engaged:**
  - **Induction supervision** within first 4 weeks;
  - **Termly formal supervision** (documented);
  - **Annual appraisal;**
  - **Spot checks/observations** (including remote session audit).

All supervision discussions that touch on identifiable cases are recorded and stored securely.

### F4 Monitoring & assurance

- **Annual policy read & sign-off** (and after any mid-year update).
- **Knowledge checks** after annual updates or serious incidents.
- **Safeguarding file audit** (termly).
- **Non-compliance process:** temporary pause of delivery → remedial training → re-assessment → potential removal from caseload. *SCC CD1397 expectation*

## G: Useful Contact Details

DSL Charlotte Booth [charlotte@essexbest.com](mailto:charlotte@essexbest.com) 07863344999

### Local authority contacts

LADO [Lado@essex.gov.uk](mailto:Lado@essex.gov.uk)

LADO [lado@suffolk.gov.uk](mailto:lado@suffolk.gov.uk)

### Specialist helplines

Police – immediate threat - 999

Police – serious concerns – 101

Prevent (non-emergency advice) – 0800 011 3764

NSPCC helpline – 0808 800 5000

Childline – 0800 1111

Ofsted – 0300 123 4666

## **Appendix: Cause for Concern Record Form**

## 4 Appendix B

### Record of concern about a child/young person's safety and welfare

Part 1 (for use by any staff – must be handwritten and legible)

Pupil's name:	Date of birth:	Class/Form:
Date & time of incident:	Date & time (of writing):	
Name (print): ..... Job title:		
Signature: .....		
Record the following factually: Nature of concern, e.g. disclosure, change in behaviour, demeanour, appearance, injury, witnesses etc. <i>(please include as much detail in this section as possible. Remember – the quality of your information will inform the level of intervention initiated. Attach additional sheets if necessary. Complete body map if injury/marks seen)</i>		
What is the pupil's perspective?		
Professional opinion, where relevant <i>(how and why might this have happened?)</i>		
Any other relevant information. Previous concerns etc. <i>(distinguish between fact and opinion)</i>		
Note actions, including names of anyone to whom your information was passed and when		

Check to make sure your report is clear to someone else reading it.

**Please pass this form to your DSL without delay**

## Record of concern about a child/young person's safety and welfare

### Part 2 (for use by DSL)

Information received by DSL:	Date:	Time completed:	From whom:		
Any advice sought, if applicable	Date:	Time completed:	From: name/organisation:		
	Advice received:				
Action taken with reasons recorded <i>(e.g. MARF completed, monitoring advice given to appropriate staff, CAF etc)</i>	Date:	Time completed:	By whom:		
Outcome	Date:	Time completed:	By whom:		
Parent/carer informed?	<b>Y</b>	Who spoken to:	Date:	Time:	By whom:
	<b>N</b>	Detail reason:			
Is any additional detail held, if so where?					
Prior safeguarding history	No of previous records of concern:				
	Has the child been subject of CAF/Early Help assessment?				
	Currently on CP Plan (CPP) / Child in Need Plan (CiN)				
	Previously on CP Plan (CPP) / Child in Need Plan (CiN)				
	Is child known to other agencies?		Y / N		
Name of DSL:			Signature:		

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