

Safeguarding And Child Protection Policy



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Position: Managing Director

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1. Introduction

- 1.1. BrightTeach is committed to safeguarding and protecting children, and we believe they should never experience abuse of any kind. This document outlines our approach to supporting staff and tutors as they safeguard and protect the children they come into contact with.

We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. The welfare and protection of children and young people are central to our work. We will give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. We recognise that children and young people can be



more vulnerable due to previous experiences, impacts of discrimination, their communication needs, their level of dependency or other issues.

1.2. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. All adults at BrightTeach prioritise children's welfare and encourage them to express any worries they may have. We expect all staff, directors and tutors to:

- Prevent the impairment of children's physical or mental health or development.
- Protect children from maltreatment.
- Ensure children grow up in the circumstances consistent with providing safe and effective care.

2. Purpose and Aims

2.1. The purpose of this document is to protect children and young people who receive BrightTeach services from harm. This includes the children of adults who use our services and to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection. The content of this policy applies to all staff, directors and tutors of BrightTeach.

- The staff, directors and tutors of BrightTeach recognise its contribution to safeguarding children.
- BrightTeach is responsible for providing a positive, safe and stimulating environment that promotes the child's social, physical and moral development.

2.2. Therefore, the purpose and aims of this policy are:

- To follow the procedures set out by local authorities' Safeguarding Children's Boards, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2023.
- To support the child's development in ways that will foster security, confidence and independence.
- To raise the awareness of teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse and/or neglect. This is achieved through induction, training, policy, procedures and a Code of Conduct for staff.



- To provide a systematic means of monitoring children known or thought to be at risk of harm.
- To support pupils who have been abused, have witnessed violence towards others or may be vulnerable to abuse in accordance with their agreed Child Protection Plan.
- To emphasise the need for good levels of communication among all members of staff.
- To follow the procedures for recruitment and selection of staff ensuring that all adults within BrightTeach who have access to children have been checked as to their suitability and have a current enhanced DBS in place and to maintain an active vigilance thereafter.
- To set out a structured procedure within BrightTeach in cases of suspected abuse.
- To share information about child protection and good practice with children, parents/carers and staff.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care, sharing information about concerns with agencies who need to know, and involving parents, carers and children appropriately.
- To ensure all staff are aware of BrightTeach's Code of Conduct.
- To provide effective management for staff through support, supervision and training.

3. Legislation and policies

3.1. The following legislations and policies inform safeguarding in BrightTeach:

- Working Together to Safeguard Children 2018.
- Keeping Children Safe in Education DfE 2023.
- The Education (independent school standards) Regulations 2014.
- DfE Mental Health and Behaviour in Schools 2018.
- The Children Act 1989 and 2004.
- Education Act 2002 The Education (Health Standards) (England) Regulations 2003.
- The Further Education (Providers of Education) (England) (Regulations) 2006.
- The Children and Families Act 2014.



4. Roles and Responsibilities

4.1. Designated Safeguarding Lead and/or the Deputy

The Designated Safeguarding Lead (DSL) has overall responsibility for child protection and safeguarding. The Deputy Safeguarding Lead ensures that the Designated Safeguarding Lead role is always appropriately covered.

The Designated Safeguarding Lead and Deputy are responsible for ensuring all information, policy changes and training are passed effectively to all tutors.

The Safeguarding Lead and/or the Deputy are responsible for the following:

- To record information received from tutors, staff, directors or parents/carers.
- Assess the information quickly and carefully and ask for further information where necessary.
- Contact and consult with LADO.
- Make a referral to Social Care/Police without delay if the child is in immediate danger or agreed in the consultation with LADO.
- Discuss the concerns only with the people nominated above.
- The Designated Safeguarding Lead and Deputy are also responsible for adhering to procedures regarding referring a child if there are any concerns of abuse and neglect.
- Written, chronological records will be kept securely and confidentially even if there is no immediate response to the concern.
- When a child who is on a Child Protection Plan leaves, their information is passed on to the education placement immediately and their Social Worker is informed. A digital copy will be retained in BrightTeach's secure vault.

If there are any concerns that the Designated Safeguarding Lead or Deputy has not responded appropriately, the Local Authority safeguarding team should be informed.

4.2. Tutors

When a situation occurs during a tutoring session which may compromise the child's safety (for example, the child wanting to work with the tutor alone in their room), the tutor is responsible for informing the child of their personal safety and their right to be kept safe.

4.3. All Staff



All staff members, tutors, interns and directors should know how to recognise signs and symptoms of abuse, how to respond to students who disclose abuse and what to do if they are concerned about a child or young person. They should also be able to recognise behaviours which breach the staff Code of Conduct and know what to do if they are concerned about the behaviour of an adult.

5. Supporting Children and Young People

- 5.1. We recognise that trauma has a significant impact on children and young people. This means that children who are victims of abuse or have witnessed abuse and violence are more likely to develop low self-esteem and self-worth.

We accept that children will act in various ways due to the trauma they have experienced. It is important to always respond in a trauma-informed manner to these students. We are aware that children also need to be protected from peer-to-peer abuse.

We recognise that BrightTeach may provide the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.

- 5.2. BrightTeach will, therefore, support children through the following:

- Their study curriculum.
- Encouraging self-esteem while not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within BrightTeach to encourage the child to feel valued.
- Ensuring them that there are adults within BrightTeach whom they can approach if they are worried about anything.
- Liaising and working with support services and agencies involved in safeguarding children.
- Notifying Social Care as soon as there is a significant concern.
- Providing continuing support to a child about whom there have been concerns, who then leaves BrightTeach, ensuring that appropriate information is forwarded under confidential cover to the child's new provider.



6. Safer recruitment and supporting staff

- 6.1. BrightTeach will follow the safer recruitment guidance set out in Keeping Children Safe in Education 2023, and follow the procedures set out by the Local Authority and Local Safeguarding Children's Board.
- 6.2. Our Safer Recruitment procedure is as follows:
 - All applicants apply through the same process, and application forms are equally evaluated in line with safer recruitment procedures.
 - Successful applicants are invited for an interview and are asked the same questions with two staff members trained in Safer Recruitment present.
 - Successful interviewees are onboarded as new staff members or tutors through our induction course:
 - The induction course is a series of videos and quizzes that inform staff about the background of the business, the culture, our code of conduct, our processes and our safeguarding policies and procedures.
 - New staff members and tutors are required to fill out a checklist to ensure they have understood the content of the induction and agree to follow our terms and conditions and our Safeguarding and Child Protection Policy.
 - All new staff members and tutors are required to complete a self-disclosure form.
 - Two references are taken up.
 - An Enhanced DBS check is completed.
- 6.3. We recognise that staff working in BrightTeach who have become involved with a child who has suffered or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to discuss the situation with the Designated Safeguarding Lead and to seek further support as appropriate.

7. Abuse and Neglect

- 7.1. General Guidance
 - Guidance on recognising signs & symptoms of abuse can be found in Working Together to Safeguard Children 2018. All staff should be aware of the signs and symptoms of abuse and neglect. They should



understand that children and young people can be at risk of harm inside and outside the home and school, as well as online.

- In all cases, if staff are unsure, they should always speak with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.
- All staff should also be aware that mental health problems can sometimes indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Where children have suffered abuse and neglect or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and adulthood.
- Staff must know how these children's experiences can impact their mental health, behaviour and education.
- The following types of abuse and neglect, and possible signs and symptoms, are taken from "Keeping Children Safe in Education" (September 2023): Statutory guidance for schools on safeguarding children and safer recruitment [Gov.uk] and the NSPCC:

7.2. Definition of Abuse

- 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children."
- Possible signs and symptoms of abuse may or may not be indicators that abuse has taken place, but the possibility should be considered. The signs of child abuse aren't always obvious, and a child might not feel able to tell anyone what's happening to them. Sometimes, children don't even realise that what's happening to them is abuse. There are different types of child abuse and the signs that a child is being abused may depend on the type. For example, the signs that a child is being neglected may be different from the signs that a child is being abused sexually.



7.3. Physical Abuse

- Physical abuse is defined as “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.”

7.4. Emotional Abuse

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

7.5. Sexual Abuse

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



abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it."

7.6. Signs and Symptoms of Abuse

- These are some of the possible signs and symptoms of abuse:
 - Unexplained changes in behaviour or personality.
 - Becoming withdrawn.
 - Seeming anxious, clingy or depressed.
 - Avoiding or being afraid of particular places or people.
 - Becoming uncharacteristically aggressive.
 - Lacks social skills and has few friends, if any.
 - Poor bond or relationship with a parent.
 - Knowledge of adult issues inappropriate for their age.
 - Running away or going missing.
 - Always choosing to wear clothes which cover their body.

7.7. Neglect

- Neglect is defined as "The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate 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."
- Neglect can be difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected. But if multiple signs are noticed that last for a while, they might show there's a serious problem. Children and young people who are neglected might have.
- These are some of the possible signs and symptoms of neglect
 - Signs of appearing hungry.
 - Poor hygiene and inadequate clothing.
 - Untreated injuries, health or dental problems.
 - Housing and family issues.
 - Changes in behaviour.



7.8. Other Safeguarding Issues

- All staff should be aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education 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 are listed in the following sections.

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

- Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- Child Criminal Exploitation (CCE): Some specific forms of CCE include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crimes or threatening/committing serious violence to others.

Children can become trapped by this 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 consistently 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 criminally exploited girls can be very different from that of boys. The indicators may not be the same; however, professionals should also be aware that girls are at risk of criminal exploitation. It is also important to note that boys and girls being criminally exploited may be at higher risk of sexual exploitation.



- Signs and symptoms of CCE:
 - Frequently absent from and doing badly in school.
 - Going missing from home, staying out late and travelling for unexplained reasons.
 - Believing they are in a relationship or hanging out with someone older than them.
 - Being angry, aggressive or violent.
 - Being isolated or withdrawn.
 - Having unexplained money and buying new things.
 - Wearing clothes or accessories in gang colours or getting tattoos.
 - Using new slang words.
 - Spending more time on social media and being secretive about time online.
 - Making more calls or sending more texts, possibly on a new phone or phones.
 - Self-harming and feeling emotionally unwell.
 - Taking drugs and abusing alcohol.
 - Committing petty crimes like shoplifting or vandalism.
 - Unexplained injuries and refusing to seek medical help.
 - Carrying weapons or having a dangerous breed of dog.

- 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 producing 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 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.



- Signs and symptoms of CSE:
 - Inappropriate sexualised behaviour for their age.
 - Being frightened of some people, places or situations.
 - Being secretive.
 - Calling an older person their 'boyfriend' or 'girlfriend'.
 - Significant changes in mood or character.
 - Having money or things they can't or won't explain.
 - Physical signs of abuse, like bruises or bleeding in their genital or anal area.
 - Alcohol or drug misuse.
 - Sexually transmitted infections.
 - Pregnancy.

7.10. So-called 'honour'-based abuse

- So-called 'honour'-based abuse (HBA) refers to incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. This includes female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. It's important to be alert to the possibility of a child at risk of HBA or already having suffered HBA.
- Female Genital Mutilation (FGM):

Female genital mutilation (FGM) is the partial or total removal of the external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Whilst all staff should speak to the Designated Safeguarding Lead (or Deputy) with regard to any concerns about Female Genital Mutilation (FGM), there is a specific legal duty on tutors. If a tutor, 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 tutor must report this to the police.
- Signs and symptoms of FGM:
 - A relative or someone known as a 'cutter' visiting from abroad.
 - A special occasion or ceremony occurs where a girl 'becomes a woman' or is 'prepared for marriage'.



- A female relative, like a mother, sister or aunt, has undergone FGM.
 - A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
 - A girl has an unexpected or long absence from school.
 - A girl struggles to keep up in school.
 - A girl runs away – or plans to run away – from home.
 - Having difficulty walking, standing or sitting.
 - Spending longer in the bathroom or toilet.
 - Appearing quiet, anxious or depressed.
 - Acting differently after an absence from school or college.
 - Reluctance to go to the doctors or have routine medical examinations.
 - Asking for help – though they might not be explicit about the problem because they're scared or embarrassed.
- Forced Marriage:

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

- Indicators of Forced Marriage:
- Running away from home.
 - Self-harm or attempted suicide.
 - Appearing withdrawn, anxious or depressed.
 - Decline in engagement, performance or behaviour in education.
 - Sudden announcement of an engagement to a stranger.
 - Sudden holiday and not returning from a visit to another country.

7.11. Mental Health

- Mental health is just as important for a child's safety and wellbeing as physical health. It can impact all aspects of a child's life. All staff should be aware that negative experiences such as abuse and neglect can adversely impact a child's mental health. It can be difficult to recognise



when a child needs support with mental health issues, it's important to recognise the signs and know how to take appropriate actions. 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. Do not attempt to diagnose mental health issues or make any assumptions about what is happening in a child's life.

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

More information can be found in the [Mental Health and Behaviour in Schools Guidance](#).

- Signs and Symptoms of Mental Health Issues
 - Sudden changes in mood and behaviour.
 - Self-harming.
 - Problems with sleep.
 - Unexplained physical changes e.g. weight loss or gain.
 - Sudden decrease in academic performance or behaviour.
 - Changes in social habits, such as withdrawal from social situations and avoidance of friends and family.

7.12. Bullying

- Bullying is behaviour that hurts someone else. It includes name-calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.
- Types of bullying:
 - Physical bullying: hitting, slapping or pushing someone.
 - Verbal bullying: name calling, gossiping or threatening someone.
 - Non-verbal abuse: hand signs or text messages.



- Emotional abuse: threatening, intimidating or humiliating someone.
 - Exclusion: ignoring or isolating someone.
 - Undermining, constant criticism or spreading rumours.
 - Controlling or manipulating someone.
 - Making silent, hoax or abusive calls.
 - Racial, sexual, transphobic or homophobic bullying are also hate crimes.
 - Bullying someone because they have a disability is also a hate crime.
- Signs and symptoms of bullying:
- Belongings getting 'lost' or damaged.
 - Physical injuries, such as unexplained bruises.
 - Being fearful, reluctant or refusing to go school.
 - Changes in performance and/or behaviour at school or alternative education.
 - Asking for, or stealing money (to give to whoever's bullying them).
 - Being nervous, losing confidence, or becoming distressed and withdrawn.
 - Problems with eating or sleeping.
 - Bullying others.

7.13. Domestic Abuse

- Domestic abuse is controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and young people, and witnessing domestic abuse is child abuse. It's essential to remember domestic abuse:
- Can happen inside and outside the home.
 - Can occur over the phone, on the internet and on social networking sites.
 - Can happen in any relationship and can continue even after the relationship has ended.
 - Both men and women can be abused or abusers.
- Signs and symptoms of Domestic Abuse: It can be difficult to tell if domestic abuse is happening as perpetrators can act differently when other people are around. Children and young people might also feel frightened and confused, keeping the abuse to themselves. Signs and symptoms can include:



- Aggression or bullying.
- Anti-social behaviour, like vandalism.
- Anxiety, depression or suicidal thoughts.
- Attention seeking.
- Bed-wetting, nightmares or insomnia.
- Constant or regular sickness, like colds, headaches and mouth ulcers.
- Drug or alcohol use.
- Eating disorders.
- Problems in school or trouble learning.
- Tantrums.
- Withdrawal.

7.14. Online Abuse

- Online abuse is any type of abuse that happens on the internet. It can happen across any device connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including:
 - Social media.
 - Text messages and messaging apps.
 - Emails.
 - Online chats.
 - Online gaming.
 - Live-streaming sites.
- Children can be at risk of online abuse from people they know or strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online.
- Types of Online Abuse:
 - Cyberbullying.
 - Emotional Abuse.
 - Grooming.
 - Sexting.
 - Sexual Abuse.
 - Sexual Exploitation.
- Cyberbullying is bullying that takes place online. Unlike offline bullying, online bullying can follow the child wherever they go via social networks, gaming and mobile phones.



- Signs and Symptoms of Online Abuse:
 - Spend a lot more or a lot less time than usual online, texting, gaming or using social media.
 - Seem distant, upset or angry after using the internet or texting.
 - Be secretive about who they're talking to and what they do online or on their mobile phone.
 - Have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

8. Responses, procedures and training

8.1. BrightTeach follows the Local Safeguarding Children's board procedures for training.

- The Designated and Deputy Safeguarding Lead will receive annual training and ensure that BrightTeach staff will be updated.

All staff, directors and tutors will receive annual training to develop their understanding of the signs and symptoms of abuse and neglect. They are also trained to know their responsibility for referring any concerns. This is in line with The Children Act 1989, which states that significant harm is the threshold that justifies intervention in the family life in the children's best interest.

All staff, directors and tutors are trained to respond to a child who discloses abuse. To prevent additional abuse to the child, the staff member will:

- Give the child your full attention. Stay calm and listen carefully to the child without showing any upset or anger.
- Not promise confidentiality as it is likely the concern will have to be shared further.
- Reassure the child that they have done the right thing and let them know who you have to disclose this information to and why.
- Not ask leading questions to the child such as "And then what happened?" Allow the child to disclose at their own pace. The job is to listen, not to investigate. However, it's encouraged to ask open questions such as "Would you like to tell me anything more?"
- Not make any judgements or assumptions.



- Continue to reassure the child that they have done the right thing and acknowledge that it must have been hard for them to share.
 - Not criticise the perpetrator as it may be someone they love. Instead, after they have disclosed all they have felt comfortable, tell them what will happen next and who this information will be going to.
 - If the concern is regarding sharing nudes or semi-nudes – do not view, copy, print, share, store or save imagery, or ask the child to save or download it. Do not delete the imagery or ask the child to delete it. If the image is viewed by accident, report to the Designated Safeguarding Lead.
 - Afterwards, report this information immediately to your Designated Safeguarding Lead and in their absence, the Safeguarding Deputy (find out who at the beginning of this document).
- All staff, directors and tutors must be aware of BrightTeach's Whistleblowing policy.
 - All parents/carers are made aware of this Safeguarding Policy, which will be found on the website, and informed of the possible actions concerning child protection procedures.
 - The Safeguarding and Child Protection Policy will be reviewed annually.

8.2. All members of staff are to be aware of what to do if they have a safeguarding concern about a child:

- If the child or young person is in immediate danger, call 999.
- Safeguarding young children should always be a top priority, so if there's a concern, report it without delay.
- Some of our tutors might work in schools, care homes, or children's centres. In such cases, inform the staff about any concerns. It might be necessary to follow their reporting policies and procedures alongside this policy. Contact the Designated Safeguarding Lead for advice if the concern involves a staff member.
- Tutors are responsible for contacting the Designated Safeguarding Lead or Deputy immediately. Contact details are listed at the start of this document.
- Tutors should contact the Designated Safeguarding Lead or deputy by phone and next steps will be agreed in that conversation.
- Access is provided to the BrightTeach Safeguarding and Incident form. This should be completed without delay.



- The Designated Safeguarding Lead will inform Social Care/ MASH in the residing authority. Records will be stored on a secure site with strictly limited access.
- The record will be updated with actions and outcomes by the appropriate Designated Safeguarding Lead or Deputy.

9. Electronic Devices

- 9.1. If students are using devices with internet access during sessions, tutors should monitor the content of what students are viewing, closing any harmful or inappropriate content if they're able to. If possible, students should use devices with filtering systems. If students view harmful or inappropriate content during sessions, tutors should report this to the Designated Safeguarding Lead or Deputy.
- 9.2. BrightTeach does not permit staff and volunteers to use any personal equipment to take photos and recordings of any students. Tutors must not share their personal contact details with students or add, follow or contact with students over social media.

10. Record Keeping.

- 10.1. The Designated Safeguarding Lead or Deputy will keep detailed, accurate, secure records of concerns and referrals, which will be kept separately from academic records.
- Unless under a court order, these records are exempt from examination by parents or children.
 - If a child transfers to another educational provision, the Designated Safeguarding Lead will forward the child protection file to a named person in the young person's home authority following a written request. The file should be marked 'confidential, to be opened by addressee only'.
 - The Designated Safeguarding Lead will retain a digital copy of the child protection file stored in a secure area accessible only by appropriate senior staff members. Child Protection records about a young person who has ceased to be of compulsory age should be archived and catalogued.



- In line with NSPCC guidance, the record will be kept until the child is 25 (this is 7 years after they reach the school leaving age) (Information and Records Management Society (IRMS), 2019).
- When making a referral, the referrer should keep a written record of:
 - Discussions with child.
 - Discussions with parents/carers.
 - Discussions with staff.
 - Information provided to Social Care.
 - Advice given and decisions taken (clearly times, dated and signed).
- The referrer should confirm verbal and telephone referrals in writing within 12 hours, using the BrightTeach Safeguarding and Incident Report form or the specific Local Authority referral form as agreed with a particular Local Authority.
- BrightTeach will ensure that we keep up-to-date personal data records of all the children by regularly reminding parents to inform them of any change in family circumstances and requesting an annual update.

11. Allegations against staff, tutors or directors.

- 11.1. Working Together to Safeguard Children 2018 defines an allegation as:
- 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 or children in a way that indicates that they are unsuitable to work with children.
- 11.2. BrightTeach recognises the possibility that adults working within or for the company may harm children.
- Any concerns about the conduct of adults within BrightTeach must be taken to the Designated Safeguarding Lead or Deputy immediately.
 - Concerns will be taken to LADO on the same working day before further action.
 - BrightTeach will not internally investigate unless instructed by LADO.
 - BrightTeach will follow the Local Authority's procedures for managing allegations against staff.



11.3. Concerns may include:

- Behaviour that is inconsistent with the staff Code of Conduct, such as: inappropriate conduct outside of work.
- Being over friendly with children.
- Taking photographs/videos of children, contrary to policy.
- Humiliating children.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt'.

Any concerns should be reported to the Designated Safeguarding Lead or Deputy. If the concern is regarding the Designated Safeguarding Lead or Deputy, it should be reported to the Managing Director.

12. **Physical Intervention.**

12.1. There are some circumstances when it is appropriate for tutors to use 'reasonable force' to safeguard children. Reasonable force can be used to prevent students from hurting themselves or others, from damaging property, or from causing significant disorder. The decision on whether or not to physically intervene is down to the professional judgement of the tutor concerned and should always depend on the individual circumstances.

The use of reasonable force may involve either passive physical contact, such as blocking a student's path, or active physical contact such as leading a student by the arm away from a situation.

Tutors should acknowledge their duty to make reasonable adjustments for children with SEND, this should not only depend on the circumstances of the case but also on the information and understanding of the needs of the student.

12.2. There are occasions when other forms of physical contact with a student is appropriate. Any physical contact must be appropriate, justifiable, approached sensitively and agreed to by the child, for example; Holding the hand of the child when walking if necessary, comforting a distressed student, or demonstrating how to use a musical instrument.

12.3. Tutors should follow these guidelines:

- Read the students' EHCP before starting tutoring a new student (if applicable).



- Follow the Risk Assessment.
- Follow the Code of Conduct.
- Remember Personal Safety guidance.
- If in any doubt contact the Designated or Deputy Safeguarding Lead.

13. Online Tutoring

13.1. Safeguarding is just as important online as it is in person. Staff and tutors will continue to recognise, respond and report safeguarding concerns during online tutoring sessions. This includes both 1:1 online tutoring sessions as well as tutoring through BrightTeach STUDY.

13.2. Tutors should follow this guidance:

- Tutors will not share any personal information with students e.g. email address, phone number.
- Tutors will not add, or communicate with students on social media.
- Tutors should refer to the Staff Code of Conduct regarding their behaviour.
- Tutors will only use appropriate online platforms for 1:1 tutoring; Google Meet, Zoom, they will not use Skype or FaceTime. If in doubt about the platforms they are using, they should speak to one of the Student Support Team.
- BrightTeach STUDY tutors and staff will only communicate with students using the YouTube platform and brightteach.com.
- BrightTeach STUDY hosts will remove any personal information shared by students in the comments during sessions, including student's names, addresses, or contact details.

14. Confidentiality and Information Sharing.

14.1. The data protection act provides a framework for how information should be stored and shared. Staff, directors and tutors should:

- Not feel hindered in sharing relevant information regarding child protection and safeguarding.
- Be open and honest with the person from the outset about how the information will be shared.
- Seek advice if they are unsure what to do.
- Respect the safety and well-being of the child and consider sharing relevant information.



- Ensure all information shared is Necessary, Proportionate, Relevant, Accurate, Timely and secure.
- Keep a record of the information shared as well as the reason for sharing.
- Be aware that they cannot keep a child's secret and must inform the child that if the secret compromises the child's safety or wellbeing, they must disclose it to someone who can help.
- Be updated on safeguarding, including changes in legislation and procedures, as well as information on BrightTeach safeguarding policies and procedures. The Designated Safeguarding Lead and Deputy is responsible for informing all staff members about changes and updates.

15. Further Information and related links

NSPCC Child Protection Helpline: 0808 800 5000

Sites for more information:

Safeguarding contact details for every Local Authority in the country

<https://www.gov.uk/report-child-abuse-to-local-council>

DfE : Advice about what to do if you are worried that a child is being abused

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

DfE: Statutory guidance: Working Together to Safeguard Children 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

DfE: Statutory Guidance: Keeping Children Safe in Education 2023

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

DfE Safeguarding and Remote Education during Coronavirus (COVID-19) March 2021

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

General COVID 19 Guidance for Educational Settings December 2021

<https://www.gov.uk/government/collections/guidance-for-schools-coronavirus-covid-19>

DfE: Teaching Online Safety in Schools 2021

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

DfE: Relationship Education and Relationship and Sex Education, July 2019

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>



DfE: Mental Health and Behaviour in Schools, November 2018

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

DfE: Preventing and Tackling Bullying 2017

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

DfE Guidance: Protecting Children from Radicalisation: The Prevent Duty

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

DfE: Guidance: Safeguarding Practitioners: Information Sharing Advice 2018

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

Home Office: Preventing Youth Violence and Gang Involvement

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

Home Office: Criminal Exploitation of Children and Vulnerable Adults: County Lines

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

UKCIS: Sexting in Schools and Colleges December 2020

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

UKCIS: Tackling race and faith targeted bullying face to face and online

<https://www.gov.uk/government/publications/tackling-race-and-faith-targeted-bullying-face-to-face-and-online-a-guide-for-schools>

UKCIS: Education for a Connected World 2020

<https://www.gov.uk/government/publications/education-for-a-connected-world>

Gov.UK: Safeguarding Children: Latest Documents

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children/latest>

NPCC- When to call the police

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20police%20guidance%20for%20schools%20and%20colleges.pdf>

NSPCC, Undertaking Remote Teaching and Learning Safely

<https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely>