



New Way Tuition

Child Protection and Safeguarding Policy

Written by: Managing Director, Mandy Ward on 6th January 2025.

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Safeguarding Policy Statement

New Way Tuition Limited is firmly committed to safeguarding and promoting the physical, mental, and emotional wellbeing of all pupils, both within and beyond the premises of our organisation/alternative provision. We adopt a zero-tolerance approach to all forms of bullying, abuse, and child-on-child abuse. Our preventative safeguarding strategy is embedded across the organisation, ensuring that the wellbeing and safety of pupils remain at the forefront of every action taken.

This policy provides a clear and consistent framework for upholding our safeguarding responsibilities in compliance with all relevant legislation and statutory guidance. Our objectives will be achieved through the following measures:

- Ensuring that all staff, including the Managing Director/Designated Safeguarding Lead (DSL), are fully aware of their responsibilities under safeguarding legislation and statutory guidance, remain vigilant to signs of abuse, and take appropriate action by referring concerns to the DSL.
- Educating pupils on how to stay safe and empowering them to recognise and report unacceptable behaviour.
- Identifying and providing support for any pupil who has experienced or is at risk of abuse, neglect, or exploitation.
- Establishing a culture of safer recruitment by implementing robust procedures to deter, identify, or reject individuals who may pose a risk to children.
- Ensuring that the Managing Director, alongside any new staff or volunteers, is appointed only after all appropriate pre-employment checks have been satisfactorily completed.

The Designated Safeguarding Lead (DSL) for New Way Tuition Limited is **Mandy Ward**. In the DSL's absence, all child protection matters will be managed by the Deputy DSL, **Tracy Jordan**.

Name	Position	Contact number	Contact email
Mandy Ward	DSL	07985686992	mandy@newwaytuition.co.uk
Tracy Jordan	Deputy DSL	07715554656	Tracy@newwaytuition.co.uk
Head Office	DSL/Deputy DSL	01277 725690	info@newwaytuition.co.uk

Glossary of Key Terms

- **CCE (Child Criminal Exploitation):** Abuse where a child is coerced or manipulated into criminal activity, often benefiting the perpetrator, using violence or threats.
- **CSCS (Children's Social Care Services):** Local authority branch handling children's social care.
- **CSE (Child Sexual Exploitation):** Sexual abuse involving coercion or manipulation of a child into sexual activity, often for the perpetrator's gain.
- **DBS (Disclosure and Barring Service):** Conducts criminal record checks for those working or volunteering with children.
- **DfE (Department for Education):** UK government body overseeing education and children's services.
- **DSL (Designated Safeguarding Lead):** Senior leader responsible for safeguarding and child protection in schools.
- **EEA (European Economic Area):** EU Member States plus Iceland, Liechtenstein, and Norway (excludes Switzerland).
- **EHC Plan (Education, Health and Care Plan):** Coordinates support for pupils with significant learning needs.
- **FGM (Female Genital Mutilation):** Illegal practice involving partial or total removal of female genitalia, a form of child abuse.
- **UK GDPR:** Data protection legislation ensuring fair and secure handling of personal data.
- **HBA ('Honour-Based' Abuse):** Crimes committed to protect family or community honour.
- **KCSIE (Keeping Children Safe in Education):** Statutory guidance on safeguarding children in schools and colleges.
- **LA (Local Authority):** Local government responsible for services including education.
- **LAC (Looked-After Children):** Children in the care of the local authority for 24+ hours.
- **LGBTQ+:** Community identifying as lesbian, gay, bisexual, transgender, queer, or other protected identities under the Equality Act 2010.
- **NPCC (National Police Chiefs' Council):** Coordinates UK law enforcement and represents police leadership.
- **PLAC (Previously Looked-After Children):** Children formerly in local authority care.

Definitions for Policy Purposes

- **Children and Young People:** Refers to anyone under 18.
- **Safeguarding and Protecting Welfare:**
 - Protecting pupils from maltreatment.
 - Preventing impairment of mental and physical health or development.
 - Ensuring safe, effective care.

- Taking action for the best outcomes for pupils.
- **Consent:**
 - The freedom and capacity to choose sexual activity. Consent can be withdrawn at any time and applies to specific acts only.
 - Children under 13 cannot consent to any sexual activity.
 - The age of consent is 16.
- **Sexual Violence (Sexual Offences Act 2003):**
 - **Rape:** Penetration of the vagina, anus, or mouth without consent.
 - **Assault by penetration:** Penetration of the vagina or anus with body parts or objects without consent.
 - **Sexual assault:** Non-consensual sexual touching.
 - **Causing sexual activity without consent:** Forcing someone to engage in sexual acts, such as touching themselves or others.
- **Sexual Harassment:**
 - Unwanted sexual conduct, online or offline, creating a hostile or degrading environment.
 - Includes:
 - Sexual comments, jokes, or name-calling.
 - Physical behaviour (e.g., brushing against someone or interfering with clothing).
 - Displaying sexual images.
 - Online harassment, such as:
 - Sharing explicit content (consensual or non-consensual).
 - Upskirting.
 - Sexualised bullying.
 - Unwanted sexual messages or exploitation.
- **Upskirting:**
 - Taking images under clothing without consent to view genitals or buttocks for sexual gratification or to cause distress.
 - Criminal offence under the **Voyeurism (Offences) Act 2019**.
- **Sexting (Sharing Nude or Semi-Nude Images):**
 - Defined as sharing sexually explicit content, including indecent imagery, among pupils.
 - **Indecent Imagery:**
 - Sexual posing.
 - A child touching themselves sexually.
 - Sexual activity involving a child or animals.
 - Acts causing sexual harm to a child.

Legislation:

- Children Act 1989 & 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- UK GDPR & Data Protection Act 2018

Statutory Guidance:

- Keeping Children Safe in Education (2024)
- Working Together to Safeguard Children (2018)
- The Prevent Duty (2015)
- Channel Duty Guidance (2021)
- Multi-agency statutory guidance on FGM (2020)
- Multi-agency practice guidelines: Forced Marriage (2013)

Non-Statutory Guidance:

- What to do if you're worried a child is being abused (2015)
- Information Sharing (2018)
- Child Sexual Exploitation (2017)
- Sexual Violence and Sexual Harassment Between Children (2021)
- Sharing Nudes and Semi-Nudes: Advice for Education Settings (2020)
- Virginity Testing and Hymenoplasty: Multi-Agency Guidance (2022)

Supporting Policies or inline with:

- Children Missing Education Policy
- Child Sexual Exploitation Policy
- Prevent Duty Policy
- Child-on-Child Abuse Policy
- Anti-Bullying Policy
- E-Safety Policy
- Device User Agreement Policy (staff only)
- Data Protection and GDPR Policy
- Media Consent Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Staff Code of Conduct

- Behavioural Policy
- Use of Reasonable Force Policy
- Social Emotional and Mental Health Policy

Roles and responsibilities

Alternative provision

New Way Tuition will remain responsible for a pupil's welfare during their time at our organisation. When the LA or a School is placing a pupil with us, we will ensure to provide written confirmation that we conduct all relevant safeguarding checks on staff.

All staff have a responsibility to:

- Consider, always, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the organisations systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be yearly updated.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Safeguard pupils' wellbeing and maintain public trust in the educational profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Ensure that staff working directly with children read at least Part one of **KCSIE**.
- Ensure that staff who do not work directly with children read either Part one or Annex A of **KCSIE**.
- Support pupils to be themselves at the organisation
- Make sure that pupils are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities.
- Ensure the organisation has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems. Refer to the Social, Emotional, and Mental Health (SEMH) policy.
- Put in place appropriate safeguarding responses for pupils who go missing, particularly on repeat occasions, to help identify risks and prevent their disappearance in the future. Refer to **child missing in education with this policy**.

- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required annually.

Senior Management Team (SMT) Lead Tutors

- Guarantee that the policies, procedures, and training opportunities in the organisation are effective and always comply with the law.
- Guarantee that the organisation contributes to multi-agency working in line with the statutory guidance '**Working Together to Safeguard Children**'.
- Confirm that the organisation's safeguarding arrangements consider the procedures and practices of the LA.
- Understand the referrals/local authority criteria for action and the protocol for assessment,
- Ensure systems are in place for children to confidently report abuse and express their views, with mechanisms that are well-promoted, easily understood, and accessible.
- Facilitate a whole-organisation approach to safeguarding, ensuring that safeguarding and child protection underpin all relevant aspects of process and policy development.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the organisation's local safeguarding arrangements.
- Ensure that procedures are in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment, and victimisation, including those in relation to child-on-child abuse.
- Ensure a senior board-level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL and ensure they are trained to the same standard.
- Ensure a member of the SLT team is nominated to liaise with the LA and/or partner agencies on issues of child protection and allegations made against the Managing Director or another SLT member.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers, and contractors.
- Confirm that there are procedures to make a referral to the DBS and the TRA, where appropriate.

- Appoint a designated teacher/SENCO to promote the educational achievement of LAC and ensure they have undergone appropriate training.
- Ensure all staff receive safeguarding and child protection training upon induction, with regular updates (at least annually).
- Ensure that all staff have been subject to an enhanced DBS check.
- Guarantee there are systems for pupils to express their views and give feedback.
- Create a culture where staff are confident to challenge senior leaders over safeguarding concerns.
- Ensure staff have due regard to data protection principles for sharing and withholding information. Be aware of obligations under the Human Rights Act 1998, the Equality Act 2010, Data Protection Act 2018, UK GDPR, and local safeguarding. Refer to **Data protection and GDPR policy**
- Attend all review meetings CIN and CP meetings
- Have daily contact with Tutors

The Director and DSL has a duty to:

- Ensure that the policies and procedures particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.
- Take lead responsibility for safeguarding and child protection, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during the organisation's hours for staff to discuss any safeguarding concerns. **NB:** Individual organisations, working with the DSL, define what "available" means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Arrange, alongside the organisation, adequate and appropriate cover for any activities outside of the organisation's hours or terms.
- The DSL will refer safeguarding concerns to the local authority or the school (is dual registered). If the DSL considers the concern to be serious then they will refer cases to the following authorities:
 - To Social services or MASH where abuse and neglect are suspected, and support staff who make referrals.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.

- To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
- To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise SLT team to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Inform all staff taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at New Way Tuition, This includes:
 - Ensuring that the organisation knows which pupils have or had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so. Full guidance in the **Data protection and GDPR policy**.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school/ organisation, and consider any additional information that should be shared.

- Ensure each member of staff has access to and understands the organisation's **Child Protection and Safeguarding Policy** and procedures – this will be discussed during the staff induction process.
- Work with the SLT and all staff to ensure the organisation's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the organisation's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the organisation may make referrals for suspected cases of abuse or neglect, as well as the role the organisation plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training and update this training at least every year.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within the organisation and with the safeguarding partners, other agencies, organisations and practitioners/schools.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

The designated teacher/SENCO has a responsibility for promoting the educational achievement of LAC and previously LAC (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Multi-agency working

New Way Tuition contributes to multi-agency working as part of its statutory duty. New Way is aware of and will follow the local safeguarding arrangements.

Once New Way Tuition is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The organisation will act in accordance with the safeguarding arrangements.

The organisation will work with referral alongside CSCS, Schools, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

New Way Tuition is committed to ensuring that any identified need for early help is addressed promptly and appropriately. Where a need for early help is identified, New Way Tuition will provide access to Children's Social Care Services (CSCS) from the host Local Authority (LA) and, where appropriate, the placing Local Authority (LA), to enable them to conduct—or determine whether to conduct—a Section 17 (Child in Need) or Section 47 (Child Protection) assessment under the Children Act 1989.

Communication and Confidentiality

All safeguarding concerns will be treated with strict confidentiality in line with New Way's data protection policies. Allegations of sexual abuse or violence are subject to legal confidentiality, and the victim is entitled to anonymity. New Way will adhere to relevant policies and legislation, ensuring that information is disclosed on a need-to-know basis, particularly in criminal justice proceedings.

Concerns will be raised immediately to the appropriate authorities and referrals made without delay. Staff will not promise confidentiality during disclosures and will explain what information will be shared, and with whom. Information may be shared without consent if it protects pupils from harm or assists in preventing or prosecuting a serious crime. The Designated Safeguarding Lead (DSL) will weigh the victim's wishes against their duty to protect. If a referral is made against the victim's wishes, the reasons will be explained, and specialist support provided.

Depending on the nature of a concern, the DSL will involve parents as appropriate, ensuring discussions do not put the pupil at further risk. Discussions with the victim's parents will focus on safeguarding and support arrangements. External agencies may be involved where necessary. Any breach of confidentiality or anonymity will trigger appropriate disciplinary action and efforts to prevent future breaches. When a pupil leaves New Way Tuition, the DSL will assess whether information should be shared with the new provider to support the pupil's transition and safety.

Information sharing

New Way Tuition recognises the importance of proactive information sharing between professionals and local agencies to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on education organisations to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

For full guidance refer to the **Data Protection and GDPR policy**

Specific Safeguarding Issues

Staff will be trained and aware of specific safeguarding issues that may put children at risk. This policy outlines these issues and the actions to address them:

- **Types of Abuse:**
 - Abuse and neglect
 - Physical, emotional, sexual abuse, and neglect
- **Exploitation and Abuse:**
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE), including county lines
 - Grooming and online exploitation
 - Trafficking and modern slavery
- **Domestic and Gender-Based Violence:**
 - Domestic abuse
 - Female Genital Mutilation (FGM)
 - Forced marriage
 - Honour-based abuse (HBA)
- **Child-on-Child Issues:**
 - Bullying (prejudice-based or discriminatory)
 - Child-on-child abuse
 - Sexual violence and harassment
 - Sexting (youth-produced sexual imagery)
- **Other Safeguarding Concerns:**
 - Online safety and cyberbullying
 - Radicalisation and extremism
 - Children missing from education (CME)

- Mental health concerns (self-harm, suicidal ideation)
- Substance misuse
- Homelessness

Pupils Potentially at Greater Risk of Harm

Certain pupils are more vulnerable to safeguarding concerns due to their circumstances. Staff will be aware of the increased risks for the following groups:

Children with Additional Needs:

- Pupils with disabilities or special educational needs (SEND)
- Pupils with an education, health, and care (EHC) plan

Looked-After or Previously Looked-After Children:

- Pupils in local authority care (LAC)
- Previously looked-after children (PLAC)

Pupils Facing Challenging Circumstances:

- Those living in domestic abuse environments
- Children from families with substance misuse or mental health concerns
- Pupils experiencing poverty or homelessness

Children Missing Education (CME):

- Pupils not attending school regularly or missing education entirely

Other Vulnerable Groups:

- Pupils exposed to radicalisation or extremism
- Unaccompanied asylum-seeking children
- Pupils in the care of young carers or experiencing neglect

The fact that a pupil may be LGBTQ+ is not, in itself, a risk factor for harm. Staff will be aware that LGBTQ+ pupils may be targeted by others. Additionally, pupils who are perceived as LGBTQ+ (whether or not they identify as such) can also face increased vulnerability.

Staff will recognise that the risks to these pupils can be heightened when they lack a trusted adult to confide in. To mitigate these risks, staff will create a supportive environment, offering a safe space for pupils to express concerns and seek help and break down additional barriers to accessing support. Staff will be trained to recognise these vulnerabilities and provide tailored interventions to ensure the safety and well-being of all pupils.

For full guidance, refer to the **Anti-Bullying Policy** and **Child-on-Child Abuse Policy**.

Concerns about pupils

If a member of staff has any concern about a pupil's welfare, they will act on them immediately by speaking to the DSL or deputy DSL(s).

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the communication and confidentiality section of this policy.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL(s) with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, New Way Tuition will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency review will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

Use of Reasonable Force

The **Use of Reasonable Force** policy at New Way Tuition outlines the principles and procedures staff should follow when considering and using physical intervention with pupils. This policy ensures that the use of force is always a last resort, and it is used only in situations where it is necessary to protect a pupil or others from harm, maintain order, or prevent damage to property.

Key Points:

Purpose: Reasonable force may be used to prevent a pupil from causing harm to themselves, others, or property, or to prevent serious disruption to the learning environment. It is used only when absolutely necessary and proportionate to the situation.

Types of Force: Physical intervention may include holding a pupil, guiding them to a safe location, or removing them from a situation. However, the force used must always be the least intrusive and most proportionate to the circumstances.

Training and Understanding: All staff are trained in the appropriate use of reasonable force and are made aware of how to manage difficult situations without resorting to physical intervention.

Reporting and Recording: Any incident where reasonable force is used must be documented and reported to the Designated Safeguarding Lead (DSL). The pupil's parents or carers will also be informed, and any necessary follow-up actions will be taken.

Safeguarding Considerations: The use of force is not a substitute for good behaviour management. Staff must always consider the wellbeing of the pupil involved, ensuring that any action taken is in line with safeguarding procedures.

Policy Adherence: The Use of Reasonable Force policy is aligned with current legal guidelines, including the **Education and Inspections Act 2006** and **Keeping Children Safe in Education (KCSIE)**.

For full guidance on the use of reasonable force, please refer to the **Use of Reasonable Force** policy, which provides comprehensive details on when and how force can be used, along with staff responsibilities and reporting procedures.

Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.

- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the educational day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency review assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

Reporting Safeguarding Incidents Process

When a safeguarding concern arises, staff must follow the reporting procedure outlined below to ensure the issue is addressed in a timely and effective manner.

Step 1: Alert the Designated Safeguarding Lead (DSL)

- If a staff member has any concerns regarding a safeguarding incident or potential risk of harm to a pupil, they must immediately report their concern to the **Designated Safeguarding Lead (DSL)**, Mandy Ward, or the **Deputy DSL (DDSL)**, Tracy Jordan.

Contact Details:

- **Mandy Ward (DSL):** 07985 686 992
- **Tracy Jordan (DDSL):** 07715 554 656
- **Head Office (DSL/DDSL):** 01277 725 690
- This should be done through verbal communication to ensure the matter is addressed as quickly as possible.

Step 2: Complete an Incident Form

- After alerting the DSL or DDSL, the staff member must complete an **incident form** (appendix 1) that details the concern. This form should be filled out clearly and accurately, including any information related to the pupil, the nature of the concern, and the context in which the incident occurred.
- Once completed, the form should be emailed to **incidents@newwaytution.co.uk** for documentation and further review.

Step 3: DSL Review and Action

- Upon receiving the concern, the **DSL will review** the incident form and determine the level of risk involved.

- Depending on the severity of the concern, the DSL will take the following actions:
 - **Referral to Local Authority or School:** If the pupil is dual-registered, or if the incident involves educational settings, the DSL will alert the relevant school or local authority.
 - **Referral to Social Services or MASH:** If abuse or neglect is suspected, the DSL will make a referral to Social Services or the **Multi-Agency Safeguarding Hub (MASH)** for further investigation and intervention.
 - **Referral to the Channel Programme:** If there are concerns of radicalisation or extremism, the DSL will refer the case to the **Channel programme**. This programme is part of the **Prevent duty** and helps protect vulnerable individuals from being drawn into terrorism.
 - **Referral to the Disclosure and Barring Service (DBS):** If the staff member is concerned that a person has been dismissed or has left due to harm or risk of harm to a child, the DSL will notify the **DBS** to ensure that the individual is not allowed to work with children in the future.
 - **Referral to the Police:** If the concern involves a potential crime, the DSL will refer the matter to the **police**, in accordance with the **National Police Chiefs' Council (NPCC)** guidance. This may include cases where there is physical harm, sexual abuse, or other criminal activities.

Step 4: Keeping Parents/Carers Informed

- In cases where appropriate, the DSL will inform the **parents or carers** of the pupil about the safeguarding concern. This should be done with sensitivity and in line with safeguarding protocols, particularly when involving sensitive matters such as abuse or neglect.

Step 5: Ongoing Monitoring and Support

- After the referral process, the DSL will continue to monitor the situation to ensure that the pupil is receiving appropriate support and that any necessary follow-up actions are taken. This may involve liaising with external agencies and supporting the pupil's ongoing safety and well-being.

Step 6: Confidentiality

- Safeguarding concerns and incidents must be kept confidential, only shared with individuals on a **need-to-know basis**. Staff should not discuss the details of the incident with other pupils or individuals not directly involved in the safeguarding process.

Step 7: Record Keeping

- All safeguarding concerns, actions taken, and referrals made will be **accurately recorded** and stored securely. This will help ensure that there is a clear record of events, which can be reviewed if necessary.

Concerns about staff and safeguarding practices

If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the Director if the concern is with regards to the Director, it will be referred to the senior leadership team.

Whistleblowing

Any concerns regarding the safeguarding practices at New Way Tuition will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Allegations of abuse against staff

All allegations against staff, volunteers and contractors will be managed in line with New Way Tuition's **Allegations Against Staff Policy** – a copy of which will be provided to, and understood by, all staff. The organisation will ensure all allegations against staff, including those who are not employees of the organisation, are dealt with appropriately and that the organisation liaises with the relevant parties.

When managing allegations against staff, the organisation will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy.

Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or 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 to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Report Concerns

- New Way Tuition collaborates with multiple local authorities, each with its own policy and point of contact for managing allegations against staff working with

children and young people. These contacts are known as **Local Authority Designated Officers (LADOs)**.

- If you have any concerns about a member of New Way Tuition's management, including the Designated Safeguarding Leads (DSLs), or if a child has made an allegation against them, you are required to report this directly to the **LADO** for the local authority in which the work took place.

For full guidance refer to **Allegations Against Staff Policy**

Safer Recruitment and Staff Suitability

New Way Tuition ensures the safety of children through comprehensive pre-employment checks. All staff engaged in regulated activity will undergo an enhanced DBS check with barred list information, in line with the **Safer Recruitment Policy**. This applies to anyone responsible for the care or supervision of children, regularly working with children on the premises, or regularly coming into contact with children under 18.

The Director will oversee appropriate checks for all employees, including internal candidates and those with international experience. All managers, SLT, volunteers, and contractors will also undergo DBS and suitability checks. For centres providing care to children under eight, staff must confirm they are not disqualified from working under the Childcare Regulations 2018.

Ongoing suitability is assessed to prevent harm to children, and any staff member who harms or poses a risk to children will be referred to the DBS. The **Single Central Record (SCR)** is maintained to track all required checks for staff, including agency, supply, and trainee staff. It records information such as identity, barred list checks, DBS checks, qualifications, right to work, and Section 128 checks for management roles.

New Way Tuition ensures that all necessary checks are conducted and recorded for staff, volunteers, and supply agencies. Written confirmation of completed checks for agency staff will be maintained, and any risk assessments for volunteers will also be documented.

Refer to the Safer Recruitment Policy for full guidance on the procedures and checks related to staff suitability and safeguarding.

Supporting Staff and Tutors

We recognise that tutors who become involved with a child who has suffered harm, or appears likely to suffer harm, may find the situation distressing and emotionally challenging.

To support tutors in these circumstances, we will:

- Offer an opportunity to discuss their concerns and anxieties with the Designated Safeguarding Lead (DSL).
- Provide guidance and additional support as needed to ensure their well-being and ability to continue their work effectively.
- Ensure tutors are aware of the appropriate resources and professional support available to them, should further assistance be required.

By fostering a supportive environment, we aim to equip tutors with the necessary tools to manage the emotional impact of safeguarding issues while maintaining a focus on the child's welfare.

Student/Tutor Relationship Guidelines

To maintain professionalism and safeguard all students, tutors must adhere to the following guidelines:

- Avoid asking students personal questions about their background.
- Be open to questions or concerns students may have about attitudes or behaviours they find uncomfortable.
- Always act as a positive role model.
- Recognise that your actions may be misinterpreted, even if well-intentioned.
- Refrain from physical contact or discussing inappropriate subjects or engaging in banter.
- Never promise to keep disclosures secret; report all disclosures or concerns to the DSL.
- Do not arrange to meet students outside tuition sessions or provide transportation in your car.
- Avoid sharing personal phone numbers, email addresses, or engaging on social media platforms with students.
- Do not exchange gifts with students to prevent misunderstandings or allegations of improper conduct.
- Under the **Sexual Offences Act 2003**, it is a criminal offence for anyone working in education to engage in a sexual relationship with a student, even if the student is over the age of consent.

By following these guidelines, tutors can maintain professional boundaries and prioritise the safety and well-being of students.

Child-on-Child Abuse

For the purposes of this policy, “child-on-child abuse” is defined as abuse between children and young people.

New Way Tuition has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy’s statement of intent.

- All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of the organisation, as well as online.
- Staff will be trained to identify indicators of child-on-child abuse and respond appropriately to any reports.
- Staff will also understand that the absence of reported cases does not mean that child-on-child abuse is not happening.
- If any staff have concerns about child-on-child abuse, they will report it to the Designated Safeguarding Lead (DSL).
- Staff must challenge inappropriate behaviour between peers and will not tolerate abuse being dismissed as “banter” or “part of growing up.”

Types of Child-on-Child Abuse

Child-on-child abuse can manifest in several ways, including:

- **Bullying**, including cyberbullying and prejudice-based or discriminatory bullying.
- **Abuse in intimate personal relationships** between peers, sometimes referred to as ‘teenage relationship abuse’.
- **Physical abuse**, which may involve an online component facilitating or encouraging physical abuse.
- **Sexual violence**, including online elements that facilitate or encourage sexual violence.
- **Sexual harassment**, including online sexual harassment, either as a standalone incident or as part of a broader pattern of abuse.
- **Non-consensual sharing of sexual images**, including nude and semi-nude photos or videos.
- **Upskirting**.
- **Initiation- and hazing-type violence**, rituals that involve harassment, abuse, or humiliation used as a way of initiating someone into a group.

Safeguarding Measures

All staff will:

- Be clear about New Way Tuition's policies and procedures regarding child-on-child abuse and understand their role in preventing and responding to it.

- Be trained to recognise the heightened vulnerability of pupils with SEND (Special Educational Needs and Disabilities), who are statistically more likely to be abused than their peers. They will not assume that abuse indicators are related to a pupil's SEND but will explore them further.
- Be aware that LGBTQ+ pupils are at an increased risk of being targeted by their peers, and will understand that pupils perceived as LGBTQ+ (whether or not they identify as such) are equally vulnerable to abuse.
- Respond to incidents of sexual violence and sexual harassment between pupils of the same sex with the same level of seriousness as incidents involving pupils of the opposite sex.

Reporting and Support for Pupils

- Pupils will be made aware of how to raise concerns and make reports about any incidents of child-on-child abuse. This includes reporting concerns about friends or peers.
- Pupils will be reassured that any reports will be taken seriously, and they will be supported and kept safe throughout the process.

Management of Allegations

New Way Tuition's procedures for managing allegations of child-on-child abuse are outlined in this Child Protection and Safeguarding Policy. Staff are expected to follow these procedures, along with those in the Anti-Bullying Policy.

General Safeguarding Awareness

- All staff will understand that safeguarding issues rarely occur in isolation and that multiple issues may overlap, such as bullying, online abuse, and other concerns. They will remain vigilant and raise concerns with the DSL when appropriate.
- Staff will be aware that safeguarding incidents and behaviours may be linked to factors outside the school environment, including **extra-familial harms** (abuse or exploitation that occurs outside the family setting).
- Staff will be aware of the role technology plays in safeguarding issues, including online abuse, cyberbullying, and the sharing of indecent images, as detailed in the **E-safety and Anti-bullying Policy**.

Children Missing from Education (CME)

Definition: A child missing from education is defined as a child of compulsory school age who is not receiving a suitable education, either through a school, alternative provision, or home education. For New Way Tuition, this refers to pupils who are not attending regularly or who have been absent without permission for a prolonged period.

New Way Tuition recognises that a pupil who is missing from education is at increased risk of harm, including but not limited to, neglect, abuse, exploitation, or radicalisation. As such, the organisation is committed to identifying and supporting children who may be missing from education to ensure their welfare and academic progress are safeguarded.

Identification and Monitoring

New Way Tuition will maintain accurate and up-to-date attendance records for all pupils.

Staff will monitor attendance closely, particularly for pupils who are at higher risk of disengagement, such as those with social workers, those with SEND, or those who have previously had attendance concerns.

If a pupil is absent without prior notification and does not attend within 3 consecutive school days, the DSL will be informed immediately and a welfare check will be carried out.

For pupils who have been absent for prolonged periods, repeated absences will be monitored, and early intervention will be implemented to ascertain reasons for the absence and support the pupil's return.

Reporting Procedures:

New Way Tuition will follow the procedures set out in the Children Missing Education in line with this policy and the **attendance policy**, which requires that absences are reported to the Local Authority (LA) in line with statutory requirements.

The organisation will inform the LA when a pupil has been absent without permission, as required by the Education (Pupil Registration) (England) Regulations 2006.

In cases where a pupil is missing from education and there are concerns about their safety or well-being, the New Way tuition DLA will immediately raise a safeguarding concern with the referrals DSL, who will refer to the appropriate agencies, if necessary.

Preventative Measures:

New Way Tuition will ensure regular contact with pupils and their families, particularly those at greater risk of disengagement from education.

The organisation will promote engagement by offering tailored academic and pastoral support, and where appropriate, involve external agencies to ensure that pupils' needs are being met.

In cases of persistent absenteeism, New Way Tuition will work with parents, social workers, and the Local Authority to address any barriers and identify solution to improve the pupil's attendance and engagement with education.

Safeguarding Considerations:

- Pupils who are missing from education may be vulnerable to various forms of harm, including neglect, exploitation, or radicalisation. Therefore, if a pupil is identified as missing, the safeguarding of the child will be the top priority.
- All staff members will be trained to identify the signs that a pupil may be missing from education and how to respond appropriately.
- In cases where a pupil is missing and concerns arise, New Way Tuition will act swiftly to investigate the circumstances and take appropriate safeguarding action, in line with the Child Protection and Safeguarding Policy.

Collaboration with External Agencies:

New Way Tuition will liaise with the LA, social services, and other relevant agencies when a pupil is identified as missing from education.

The organisation will also work with the LA to ensure that children who are missing from education for an extended period are placed back into suitable educational settings or alternative provision, as needed.

Attendance Register

Pupils are placed on the attendance register on the first day that is agreed upon through the referral process. New Way Tuition will ensure that the attendance register is kept up-to-date, accurate, and maintained at all times.

Staff will regularly monitor pupils who do not attend on the agreed date. If a pupil is absent without prior notice, the staff will notify the Designated Safeguarding Lead (DSL) and report the absence according to safeguarding procedures. In cases where a pupil's absence is unexplained, New Way Tuition will follow the organisation's established protocols to ensure appropriate action is taken and any safeguarding concerns are raised.

If a pupil is absent without permission or an acceptable explanation, New Way Tuition will inform the Local Authority (LA) as required.

See full guidelines in the **attendance policy**

Changes of Address and Confidential Information

If a parent notifies New Way Tuition of a change of address for their child, the following steps will be taken:

- The new address and the effective date of the change will be updated in the **student's confidential information**
- Any relevant contact details, including emergency contacts, will also be updated as necessary

Changes of address and other confidential information will be recorded securely and managed in compliance with data protection policies. All updates to confidential student

information will be communicated to the appropriate staff members to ensure that records are accurate and up to date.

Child abduction and Community Safety Incidents

Child Abduction:

In the unfortunate event of a child going missing or being abducted, New Way Tuition has robust procedures in place to ensure the immediate safety of the child and to respond promptly and effectively to such incidents.

Immediate Response:

- If a pupil is suspected to have been abducted or is reported missing, staff will immediately notify the Designated Safeguarding Lead (DSL) and relevant authorities.
- Staff will follow the organisation's missing child procedures and contact local law enforcement as necessary.
- The pupil's details, including full name, description, and any identifying features, will be provided to authorities.

Preventative Measures:

- New Way Tuition will take appropriate steps to ensure that all pupils are collected or escorted by an authorised adult. Only individuals listed as emergency contacts will be allowed to collect a pupil.
- Any changes to collection arrangements must be communicated by parents or carers in advance, and staff will confirm the identity of the individual collecting the pupil.

Monitoring & Communication:

Staff will maintain regular communication with parents and authorities until the situation is resolved. The DSL will ensure that all steps taken are in line with safeguarding procedures, and a thorough review of the incident will be carried out to inform future practice.

Community Safety Incidents

New Way Tuition is committed to safeguarding its pupils from community-related risks and incidents that may affect their safety, both inside and outside of the learning environment.

Monitoring Risks:

- Staff will remain vigilant to any signs that may suggest a pupil is at risk of harm within their community, including gang involvement, exploitation, or exposure to violence.

- Any community safety concerns that arise will be reported to the DSL and, where necessary, local authorities will be involved to address the issue appropriately.

Working with Authorities:

- In instances where community safety incidents affect pupils (e.g., domestic violence, gang activity, substance misuse), New Way Tuition will work closely with law enforcement, social services, and any other relevant agencies to ensure the safety and well-being of the pupil.
- The DSL will ensure that appropriate referrals are made, and information is shared in line with safeguarding protocols and relevant data protection regulations.

Preventative Actions and Education:

- New Way Tuition will take an active role in educating pupils about safety in their communities, including the risks of exploitation, involvement in criminal activity, and how to access support services.
- Pupils will be encouraged to report any concerns they have about their safety, both within the school setting and outside, and staff will ensure they are aware of the support available to them.

Child criminal exploitation (CCE)

For the purposes of this policy, “**Child Criminal Exploitation**” (CCE) is defined as a form of abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into taking part in criminal activity. This may include:

- In exchange for something the victim needs or wants.
- For the financial or other advantage of the perpetrator or facilitator.
- Through violence or the threat of violence.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through **county lines**.
- Working in **cannabis factories**.
- **Shoplifting** or **pickpocketing**.
- **Committing vehicle crime**.
- **Committing or threatening to commit serious violence** against others.

New Way Tuition acknowledges that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes or if the criminal activity appears consensual. Furthermore, pupils of any gender may be at risk of CCE.

Indicators of Child Criminal Exploitation (CCE):

New Way Tuition staff will be trained to recognise the following potential indicators that a pupil may be a victim of CCE:

- Appearing with **unexplained gifts**, money, or new possessions.
- **Associating with other children involved in exploitation.**
- Suffering from **changes in emotional wellbeing**, such as increased anxiety or distress.
- **Misusing drugs or alcohol.**
- **Going missing** for periods of time or regularly returning home late.
- **Regularly missing education** or showing a lack of engagement with educational activities.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Reporting Process:

Identifying Concerns: If a member of staff suspects that a pupil may be the victim of CCE, they should immediately report their concerns to the Designated Safeguarding Lead (DSL) in line with the organisation's safeguarding procedures. Concerns may arise from observing the above indicators or from information reported by the pupil, their peers, or their family.

Initial Assessment and Support: Upon receiving a report, the DSL will conduct an initial assessment to determine whether the pupil is at risk of CCE. The DSL will gather information to understand the situation fully and consider whether further action, such as contacting external agencies, is necessary.

Referral to External Agencies: If the DSL has reasonable grounds to believe that a pupil is a victim of CCE, they will refer the case to relevant agencies, such as local safeguarding boards, the police, or social services. This may involve making a **child protection referral** to the local authority (LA) or other relevant authorities.

Collaboration and Information Sharing: New Way Tuition will work collaboratively with external agencies, including social services, law enforcement, and any other relevant organisations, to ensure the safety and protection of the pupil. Information will be shared in accordance with the organisation's **information-sharing protocol** and in compliance with **data protection laws**.

Monitoring and Follow-up: After a referral is made, New Way Tuition will continue to monitor the pupil's wellbeing and educational attendance. Staff will be alert to any changes in the pupil's behaviour or any further signs of exploitation. The DSL will maintain regular communication with external agencies and, where appropriate, the pupil's family to ensure appropriate support and safeguarding measures are in place.

Support for the Victim: Throughout the process, New Way Tuition will ensure that the pupil receives appropriate support, which may include:

- **Mentoring and Support**
- **Targeted interventions** to address the root causes of exploitation and help reduce vulnerability to further harm.
- **Advocacy and guidance** to help the pupil understand their rights and available support options.

Review and Evaluation: Following any case of suspected or confirmed CCE, the organisation will conduct a review to evaluate the effectiveness of the response. This review will inform future safeguarding practices and any necessary changes to policies or procedures.

Female Genital Mutilation (FGM) Reporting Procedures

Female Genital Mutilation (FGM) involves the partial or total removal of external female genitalia or other injury to female genital organs. It is illegal in the UK, classified as **child abuse**, and has severe long-term consequences for the physical and mental health of those affected.

Legal Requirements:

New Way Tuition is legally required to report any known cases of FGM in pupils under 18 years old to the police, whether the information comes from a disclosure by the pupil or evidence suggesting FGM has occurred. This obligation applies regardless of whether the child has provided consent or not. It is a **mandatory reporting duty** for all staff members.

Staff must report concerns of FGM to the **Designated Safeguarding Lead (DSL)** immediately, who will then make a report to **the police and/or Children's Social Care Services (CSCS)** in accordance with safeguarding procedures.

This **mandatory reporting requirement** does not apply in cases where the pupil is over the age of 18 or if there is suspicion but no evidence. In such cases, local safeguarding processes will apply.

Risk Indicators for FGM:

Staff should be vigilant and aware of the following indicators that a pupil may be at risk of FGM:

- Family socio-economic position and **level of integration** into UK society.
- Pupil's affiliation with a **community** that practices FGM.
- **Female family members** who have undergone FGM.

- **Withdrawal from PSHE lessons** or other educational activities.

Signs FGM May Occur Soon:

Staff should be alert to the following signs that FGM may be imminent:

- Family elders or relatives visiting from countries where FGM is practiced.
- **Mentions of a “special procedure” or “ceremony”.**
- Discussions regarding **long trips to high-risk countries** known to practice FGM.

Indicators FGM May Have Taken Place:

The following physical and emotional signs may indicate that FGM has already occurred:

- Difficulty **walking, sitting, or standing.**
- **Prolonged bathroom visits** or complaints of **medical issues** such as infections or pain.
- **Frequent absences** from school, withdrawal, or symptoms of **depression.**
- **Reluctance to undergo medical examinations** or unexplained anxiety during health checks.

Honour-Based Abuse (HBA):

FGM is a form of **Honour-Based Abuse (HBA)** and must be treated with the same level of seriousness. Staff must report any concerns about **honour-based abuse** to the DSL, who will follow the local safeguarding protocols. This may include involving the police and social services, depending on the specifics of the case.

Reporting Procedure:

Staff Identification: If a staff member has concerns or becomes aware that a pupil may be at risk of or has already undergone FGM, they must immediately report their concerns to the DSL.

Initial Reporting: The **DSL** will investigate the concern and determine whether it requires a referral to the police or social services. If it is established that FGM has occurred or is likely to occur, a **mandatory report** will be made to the police, as per UK law.

Referral to Police and Social Services: If FGM is suspected or confirmed, the DSL will follow the safeguarding protocols to involve relevant agencies such as the **police** and **Children’s Social Care Services (CSCS)**. The pupil's welfare and safety will be the priority throughout this process.

Support for the Victim: Throughout the process, New Way Tuition will ensure that the pupil receives appropriate emotional and psychological support. This may include counselling or other forms of intervention to help the pupil manage the trauma associated with FGM.

Training and Awareness: All staff will receive annual training on **Honour-Based Abuse (HBA)** and **FGM**. The DSL will ensure that staff members are well-equipped to identify potential victims of FGM and understand the legal requirements regarding the reporting of such incidents.

Confidentiality and Information Sharing: Any information related to FGM will be shared in accordance with New Way Tuition's **information-sharing protocol**, ensuring confidentiality is maintained while fulfilling the statutory obligations to report FGM.

Monitoring: Following any reports of FGM or suspected risk, New Way Tuition will continue to monitor the pupil's safety, attendance, and emotional wellbeing. The DSL will ensure that appropriate action is taken to support the pupil and safeguard their welfare.

Forced Marriage Reporting

For the purposes of this policy, a "forced marriage" is defined as a marriage that is 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 the marriage. This includes **physical, emotional, or psychological** threats, and situations where one party is unable to consent (e.g., due to Special Educational Needs and Disabilities, SEND). **Forced marriage is illegal** in the UK and is recognised as **child abuse** and **honour-based abuse (HBA)**.

Signs that a pupil may be at risk of Forced Marriage:

Staff at New Way Tuition should be alert to the following potential indicators that a pupil may be at risk of, or has already undergone, forced marriage:

- **Emotional signs** such as anxiety, depression, and withdrawal, with **low self-esteem**.
- **Mental health concerns**, including **self-harm, eating disorders** (e.g., anorexia), and other distressing behaviours.
- A sudden **decline in academic performance, motivation**, or aspirations.
- Frequent or unexplained **absences from education** or **poor punctuality**.
- **Family history** of early marriages or older siblings leaving education early.

Reporting Process for Forced Marriage:

Initial Identification by Staff:

If a member of staff becomes aware of or suspects that a pupil is at risk of or has been subjected to forced marriage, they must **immediately report** their concerns to the **Designated Safeguarding Lead (DSL)**.

Concerns may arise from a **disclosure** from the pupil, **behavioural changes**, or **patterns of attendance and academic performance**.

DSL Assessment and Initial Action:

The **DSL** will carefully assess the situation and determine whether there is a **genuine risk** of forced marriage. If the **DSL** believes the pupil is **at immediate risk**, appropriate safeguarding measures will be taken immediately.

Referral to the Local Authority (LA):

The **DSL** will raise the concern with the **Local Authority** and refer to **Children's Social Care Services (CSCS)** as per the local safeguarding procedures.

The **LA** will take further action to investigate and ensure the pupil's safety.

Referral to the Forced Marriage Unit (FMU):

The **FMU**, a part of the UK Home Office, provides expert advice and support to individuals at risk of forced marriage. The **DSL** will contact the **FMU** helpline for guidance if the pupil is at significant risk.

The **FMU** offers support to protect the pupil through a range of services, including advice on how to proceed and what protections can be put in place.

Engagement with the Police:

If a pupil is believed to be **at imminent risk** of forced marriage, the **police** will be notified immediately.

The **DSL** will liaise with the **police** to ensure appropriate protective actions are taken, such as an investigation into the situation.

Confidentiality and Information Sharing:

Information will be treated as confidential but shared with the **LA, CSCS, police,** and **FMU** on a **need-to-know** basis to ensure the pupil's safety.

The **DSL** will follow appropriate data protection laws when sharing personal information but will prioritise the pupil's safety over confidentiality.

Ongoing Support and Monitoring:

After a referral, New Way Tuition will ensure the pupil continues to receive **support services** to address their emotional, psychological, and physical needs.

This could involve working with local support agencies, such as **social services, mental health professionals,** and the **FMU**.

The **DSL** will **monitor** the pupil's situation to ensure that they are no longer at risk, and any ongoing support will be provided, such as **counselling, advocacy,** and **mental health services**.

Training for Staff:

All staff at New Way Tuition will undergo **annual training** to recognise the signs of **honour-based abuse (HBA)** and **forced marriage**.

The training will include information on how to identify risk factors, understand the referral process, and provide support to vulnerable pupils.

The **DSL** will ensure staff are kept up to date on any changes in safeguarding legislation and procedures relating to forced marriage.

Review and Monitoring:

The **DSL** will regularly review the pupil's case and ensure that all safeguarding measures are still in place.

The **LA** and **other agencies** involved will provide feedback to ensure ongoing safeguarding and protection for the pupil.

Trafficking and modern slavery

For the purposes of this policy, "**modern slavery**" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the DSL to escalate to the National Referral Mechanism.

Signs of Modern Slavery

Physical Signs:

- Unexplained injuries or signs of physical abuse (e.g., bruises, burns, scars).
- Poor personal hygiene or an unkempt appearance.
- Signs of malnourishment or untreated medical issues.

Behavioural Signs:

- Appearing fearful, anxious, or withdrawn.
- Being overly submissive or showing an unusual level of deference.
- Reluctance to make eye contact or engage in conversation.
- Seeming isolated or unable to form friendships.

Work or Living Conditions:

- Being seen in inappropriate work environments for their age.
- Reporting excessively long working hours or no days off.
- Living in poor, overcrowded, or unsuitable housing.
- Having little or no control over personal identification or documents.

Social or Financial Indicators:

- Not attending school regularly or having unexplained absences.
- Sudden possession of expensive items or cash without a clear source.
- Being accompanied by someone who insists on speaking for them or controlling them.
- Evidence of exploitation via social media or online platforms.

Other Concerns:

- Being transported frequently without explanation.
- Signs of sexual exploitation or inappropriate relationships.
- Being overly secretive about their whereabouts or activities.

If you suspect a young person is a victim of modern slavery, it's crucial to report concerns immediately to the DSL.

County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, New Way’s staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will raise a course of concern with the Local authority or School and consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘**cyber-enabled**’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘**cyber-dependent**’ crimes, i.e. crimes that can be committed only by using a computer.

Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme. Full guidance in the **E-safety policy**.

Radicalisation and Extremism

Protecting pupils from the risk of radicalisation is part of the New Way’s wider safeguarding duties. New Way will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. New Way will work with local safeguarding arrangements as appropriate.

Under section 26 of the Counterterrorism and Security Act 2015, all alternative education providers are subject to a duty to have “**due regard to the need to prevent people from being drawn into terrorism**”, known as “**the Prevent duty**”. The Prevent duty will form part of the organisation’s wider safeguarding obligations.

Signs of radicalisation

- Drastic personality shifts
- Becoming withdrawn or secretive
- Increased isolation from family and friends
- Obsessive interest in a specific ideology
- Unwillingness to listen to other perspectives
- Change in peer groups
- Use of extremist language, slogans, or symbols
- Declining performance in education or work

- Consuming or sharing extremist content online
- Spending time in unmoderated extremist forums
- "Us vs. them" black-and-white thinking
- Expressing grievances or blaming specific groups
- Heightened anger, hostility, or paranoia
- Adopting a new, extreme identity or lifestyle
- Possession of items tied to potential harmful actions

For full guidance please refer to the **Prevent Policy**.

Anti-Bullying and Cyberbullying

Bullying is a harmful behaviour where an individual or group repeatedly targets someone with the intention to hurt, intimidate, or harm them. It can take various forms, including physical bullying (hitting or pushing), verbal bullying (name-calling, teasing), and social bullying (spreading rumours or exclusion). The impact of bullying can cause severe emotional distress, anxiety, and in some cases, lead to long-term mental health issues.

Cyberbullying is a form of bullying that occurs online or through digital platforms such as social media, texting, and gaming. It includes actions like sending hurtful messages, spreading rumours online, impersonating someone, or sharing private information without consent. Cyberbullying can be particularly damaging due to its 24/7 nature, reaching victims at home or on personal devices.

Both bullying and cyberbullying are serious safeguarding issues that can harm an individual's well-being and affect their mental and emotional health. It is crucial that all staff, students, and parents understand the importance of addressing and preventing these behaviours.

For detailed guidelines on how to prevent, report, and address bullying and cyberbullying, refer to the **Anti-Bullying and E-safety Policy**. This policy outlines the clear steps for reporting incidents, the support available for victims, and the consequences for those who engage in bullying behaviour. It is designed to create a safe and respectful environment for everyone.

Mental health

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

Staff will not attempt to make a diagnosis of mental health problems – New Way will ensure this is done by trained mental health professionals. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem

or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s).

New Way will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

Substance Abuse

Substance abuse, including alcohol, drugs, and other harmful substances, is a significant safeguarding concern. It can have a severe impact on a child or young person's physical and emotional health, education, and overall wellbeing. At New Way Tuition, we are committed to ensuring that pupils are safeguarded from the risks of substance abuse, whether it is happening within the provision or outside of it.

Recognising the Signs of Substance Abuse:

All staff at New Way Tuition will be trained to recognise the signs and symptoms of substance abuse, which may include:

- **Physical signs** such as frequent nosebleeds, unexplained bruising, fatigue, or changes in appetite or hygiene.
- **Behavioural changes** such as a sudden decline in academic performance, irregular attendance, isolation from peers, or withdrawal from activities.
- **Emotional signs** such as mood swings, anxiety, depression, or aggression.
- **Social indicators** such as associating with known drug users, or involvement in risky behaviours (e.g., skipping school or engaging in criminal activity).
- **Signs of overdose or intoxication**, including slurred speech, unsteady movements, or a sudden change in coordination.

Staff who have a substance abuse concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s).

Homelessness

The DSL and deputy DSL(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.

- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to the local authority or the CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family- based and referrals to CSCS will be made as necessary where concerns are raised.

Upskirting

Upskirting is the act of taking a photograph or video up someone’s skirt or clothing, typically without their consent. This is often done to capture intimate images or videos for the purpose of voyeurism, harassment, or exploitation.

In the UK, **upskirting** is illegal under the **Voyeurism (Offences) Act 2019**, which makes it a criminal offence to take such images, distribute them, or threaten to do so. It is considered a serious invasion of privacy, and perpetrators can face penalties, including imprisonment. Any concerns must be reported to the DSL.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime.

These indicators include, but are not limited to:

- Increased absence from education.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil’s vulnerability to becoming involved in serious violence.

These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from education.
- Having been permanently excluded from an educational setting.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

E-Safety and Online safety

New Way Tuition will always adhere to the E-Safety Policy.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Monitoring and filtering

New Way will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material, see **monitoring and filtering policy** for full guidance and in accordance with the organisation's **Data protection and GDPR policy and E-safety policy**. The organisation will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to. Reasonable restrictions as to what pupils can be taught online.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified.

Consensual and non-consensual sharing of indecent images and videos

New Way Tuition will ensure that staff are aware of their duty to treat both consensual and non-consensual sharing of nude or semi-nude images/videos (also known as sexting or youth-produced sexual images) as a safeguarding concern.

Guidelines for Staff:

- **Training:** Staff will receive appropriate training on child sexual development, distinguishing between normal, age-appropriate sexual behaviour and harmful, inappropriate sexual behaviour. This includes understanding motivations behind

sexting, assessing risks to students depicted in the images, and knowing when and how to report incidents.

- **Awareness:** Staff will be made aware that the creation, possession, and distribution of indecent images of children is a criminal offence, regardless of whether the person depicted in the image is the one who created, possessed, or distributed it. However, staff will be cautious not to unnecessarily criminalise pupils.

Procedure When an Incident of Sexting is Reported:

If a staff member becomes aware of a sexting incident involving indecent images of a pupil, they must:

- **Refrain from:** viewing, copying, printing, sharing, storing, or saving any indecent images.
- **Report immediately:** inform the Designated Safeguarding Lead (DSL) about the incident without delay, whether the staff member has accidentally viewed the image or not.
- **Support the pupil:** reassure them without blame or shame and explain that the matter will be reported to the DSL.
- **Contextualisation:** Safeguarding incidents can happen outside of New Way Tuition. The DSL and deputy DSLs will assess whether any external or environmental factors might contribute to the issue.

Categories of Sexting Incidents:

- **Aggravated Incidents:** These involve additional abusive elements, such as adult involvement, harmful intent, or reckless sharing.
- **Experimental Incidents:** These are typically peer-related, where no adult involvement or malicious intent is evident, though they still require intervention.

Handling Indecent Imagery:

If it is necessary to view indecent imagery (e.g. to make decisions regarding further action or to inform other agencies), the following steps will be taken:

- **Consultation:** The decision to view the imagery will be discussed with the Director or Senior Leadership Team (SLT).
- **Gender considerations:** The image should, where possible, be viewed by someone of the same sex as the individual depicted.
- **Supervision:** Viewing will occur on New Way Tuition's premises, with another member of staff present in the room (but they do not need to view the image).
- **Documentation:** All decisions regarding viewing imagery will be carefully recorded in accordance with the **Data protection and GDPR policy**

Next Steps for Different Categories:

- **Aggravated Incidents:** Handled according to New Way Tuition's **Child on Child Abuse Policy**.
- **Experimental Incidents:** The pupils involved will be supported to understand the implications of sharing indecent imagery and provided with guidance on how to move forward.
- **Potential Harm:** If there is reason to believe that the circulation of the images could cause harm to the pupil, the DSL will escalate the situation to CSCS.
- **Public Sharing:** If the imagery is publicly shared, the DSL will work with the pupil to remove the content and provide ongoing support.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Primary aged pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Secondary aged pupils will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Monitoring and review

This policy is reviewed at least annually by the DSL and the director. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is January 2026

Appendix 1 – Incident, Concern, Accident Form



Cause For Concern

Incident Report	Cause for Concern	Complaint	Alleged Bullying Incident
Alleged Homophobic	Online Safety Incident	Injury/Accident	Alleged Racial Incident

Student:	Location:

Summary of Events/Concern/ Parent/Carer/Guardian Involvement:

Action Taken by Adult Investigating Incident:

Parent/Carer/Guardian as above:

.....

Designated Safeguarding Lead/Senior leadership Teams Involvement:

.....

Incident Resolved:

Yes No

Further Action/Referral Required:

.....

Information added to Safeguarding Chronology:

Yes N/A (for office use only)

Signed (Person Reporting Concern)

.....

Dated:

Signed (Senior Leadership Team/Designed Safeguarding Lead):

.....

Dated:

.....