



Safeguarding

This policy applies to all aspects of Bright Sparks Tutors in relation to tutoring services. The policy and supporting procedures apply to all directors, staff, tutors, and all other people who conduct work on behalf of Bright Sparks Tutors.

The purpose of this policy is to ensure that, regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all students have a positive experience of Bright Sparks Tutors through the services, support or activities they engage in.

Bright Sparks Tutors are fully committed to ensuring all children are kept safe and well and that they are protected from abuse and harm. We take all necessary steps to ensure staff are well trained and understand their duties, that all staff, students and volunteers are suitable to work with children, and that any concerns about a child's safety or welfare are acted upon without delay, following the Child Protection and Safeguarding procedures as per the local arrangements for the student's local authority.

At Bright Sparks, we recognise the signs and indicators that a child may be being abused as described below.

Physical Abuse:

- This involves hitting, shaking, throwing, burning, suffocating or any other physical harm. Deliberately causing a child's ill health also constitutes physical abuse.

Sexual Abuse:

- This involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. Showing children pornographic materials, sexual activities, or encouraging children to behave in sexually inappropriate ways also constitutes sexual abuse.

Emotional abuse:

- Varying degrees of emotional abuse is present in virtually all child protection incidents, but can also constitute abuse in its own right. Emotional abuse involves persistent or severe emotional ill-treatment or torture causing, or likely to cause, severe adverse effects on the emotional stability of a child. Such behaviour may involve conveying to a child that they are worthless, unloved, or inadequate, or making them feel unnecessarily frightened or vulnerable.

Neglect:



- Is the persistent failure to meet a child's basic physical, emotional or psychological needs, such as is likely to have a severe impact on their health, development or emotional stability. Neglect may involve failing to provide adequate food, shelter or clothing for a child, or failing to adequately protect them from physical harm or ill health. Neglect can also manifest itself in a failure to meet the basic emotional needs of child.

Domestic abuse:

- Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Witnessing this abuse amounts to emotional abuse.

Female Genital Mutilation:

- Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. See further information toward end of policy.

Child Sexual exploitation:

- Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status.

The following procedures have been developed to:

- Prevent and reduce the incidence of abuse.
- Increase awareness of issues concerning the abuse of children.
- Provide a process if issues of concern are disclosed or discovered.
- Improve the quality of life and protection of children with whom we work.
- Protect people from harm
- Make sure people can raise safeguarding concerns
- Handle allegations or incidents
- Report to the relevant authorities

We must be alert to the risks from:

- Sexual harassment, abuse and exploitation
- Negligent treatment
- Physical abuse
- Emotional abuse
- Bullying or harassment
- Health and safety
- Criminal exploitation
- Radicalisation and extremism
- Forced marriage and honour-based violence
- Trafficking or modern slavery
- Female genital mutilation
- Discrimination on any of the grounds in the equality act 2010
- People targeting our organisation



- Culture within the organisation allowing poor behaviour
- People abusing a position of trust they hold within MTW

Recruitment and Selection

Responding to suspicions of abuse

Bright Sparks Tutors are aware of the responsibility for ensuring that we carry out appropriate safer recruitment practices for all positions within the organisation. The Safeguarding Vulnerable Groups Act 2006 requires the organisation to carry out specific vetting (enhanced DBS and barred list checks) on staff or tutors if they work with children and young people.

In order to deter unsuitable individuals and inappropriate behaviour, Bright Sparks will highlight the Safeguarding statement (see section 2) to tutors throughout the recruitment process.

Training

Bright Sparks Tutors believe that training and raising awareness of safeguarding issues, policies and procedures is fundamental to the development and maintenance of a safer environment, safer organisation and safer staff/ tutors. It will ensure that appropriate safeguarding training is provided to all staff and tutors to assist them in:

- preventing abuse
- recognising abuse
- recording concerns
- responding appropriately to allegations of abuse
- knowing who to tell, and
- when information can be shared.

Safeguarding training at the appropriate level to the role and responsibilities held will be a mandatory element of all inductions for staff and tutors. Furthermore, safeguarding training will not be regarded as a 'once only' activity, but as an ongoing development of skills and knowledge of safeguarding practices.

Monitoring the working practice of staff and tutors will be undertaken not less than once per year through the appropriate supervision mechanisms such as appraisals to ensure the requirements of this policy and supporting procedures are being met.

Procedure

Staff Responsibilities



- Each individual member of staff has a duty, and is expected to share Bright Sparks Tutors' commitment, to safeguard children and promote their welfare.
- This duty includes a requirement to whistle-blow if they have any safeguarding concerns or witness or learn about anything that puts a child at risk (see Whistle Blowing Procedure for Staff, Students and Volunteers in welcome pack)
- Staff are asked to attend training and supervisions and ensure they read and implement all policies.
- All staff must be alert to possible signs of abuse and neglect and respond to any concerns they identify - usually this means reporting the matter to the named Kayleigh Rapson without delay.
- Staff are also expected to disclose convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children.
- Kayleigh Rapson is the designated 'Designated Safeguarding Lead (DSL)' for Bright Sparks Tutors. She has the 'lead' responsibility for safeguarding children. She will lead training and support all other staff in understanding and meeting their responsibilities as well as liaising with parents, carers and agencies.
- We acknowledge that abuse of children can take different forms – physical, emotional, and sexual, as well as neglect.
- We understand that abuse can take place in anywhere and involve a child or individuals from any family, background or culture – irrespective of whether they appear disadvantaged or not.
- We consider the following as possible signs of abuse or neglect:
 - Significant changes in children's behaviour or Deterioration in children's general well-being or appearance
 - Unexplained bruising or marks (including scratches, bite-marks or burns)
 - Children's comments or behaviour which give cause for concern, including disclosure, (see below Recording Disclosures) inappropriate role-play or language
 - Inappropriate behaviour displayed by other members of staff – for example sexual comments; excessive one-to-one attention beyond the requirements of their role and responsibilities; or inappropriate sharing of images (See below Allegations against staff)

Where such evidence is apparent, the tutor must complete a Cause for Concern form as a dated record of the details of the concern. This is shared and discussed promptly, without delay, with Kayleigh Rapson, the Designated Safeguarding Lead. The DSL decides what



response is appropriate using the Children's Services Threshold document. A hard copy of this is available in the Safeguarding folder in the locked cabinet in the office.

If a staff member feels that the cause for concern has not been dealt with effectively by the DSL then staff can discuss concerns with the local authority directly who will advise accordingly.

Records of incidents are stored in the safeguarding chronology file which is locked in the draw in the office. If we have immediate concerns about a child's safety, we notify the safeguarding team in the child's local authority. In an emergency, when a child is deemed to be in imminent danger, we notify the police by calling 999. We share information and co-operate fully with any investigation and attend any multiagency meetings arranged by child's local authority.

Recording suspicions of abuse and disclosures

When a child makes a comment to their tutor or other member of staff that gives cause for concern (disclosure), the tutor/staff member will:

- listen to the child
- not ask leading questions
- gently clarify understanding
- offer reassurance and give assurance that she or he will take action
- make a prompt, accurate written record (typically a Cause for Concern Form) that forms an objective record of the observation or disclosure that includes:
 - the date and time of the observation or the disclosure
 - the exact words spoken by the child, as far as possible
 - the name of the person to whom the concern was reported, with date and time
 - the names of any other person present (witnesses) at the time.

These records are signed and dated and kept in the safeguarding chronology file which is kept securely and confidentially. Concerns are then referred to as explained above.

Informing & Supporting parents

- When appropriate, concerns are discussed with a parent or carer who is normally the first point of contact.
- DSL assesses whether it is 'appropriate' to speak to the parent about concerns (e.g. whether doing so is necessary to safeguard the child from any potential harm.)



- If a concern or suspicion of abuse is recorded and a referral to the local authority safeguarding team is made, parents are informed via telephone or a face-to-face meeting, at the same time as the referral is made.
- If a parent/carer refuses consent for a referral then the DSL reserves the right to make a referral without consent via FDFP.
- Bright Sparks Tutors may decide NOT to inform the parents, in accordance with the guidance of the local authority if it is considered that informing the parent may potentially put the child at further risk.
- In these cases, it is the decision of the social services team as to whether or when parents are informed.
- We provide on-going support to parents involved in any investigation, as appropriate. Liaison with other agencies
- We work within the child's local authority safeguarding guidelines
- We follow any Child Protection Plans or actions agreed during Case Conferences as well as any other reasonable requests.
- We have procedures for contacting the concerned local authority about child protection issues, including maintaining a list of names, addresses and telephone numbers of social workers, to ensure that it is easy, in any emergency, for the setting and social services to work well together.
- Allegations against staff
- We ensure that all parents and staff know how to complain about the behaviour or actions of staff, students, or volunteers within Bright Sparks (See Whistle Blowing Policy / Disciplinary Procedures in the welcome pack).
- If an allegation is made:
 - The allegation should be referred to the designated safeguarding Lead (Kayleigh Rapson) who will take necessary steps to ensure the safety of the child and any other child who may be at risk.
 - The allegation will be reported immediately to the appropriate Local Authority Designated Officer
 - The allegation will also be reported the appropriate safeguarding team, dependent on the tutor's local authority.
- If there is an immediate risk to the child, the police will be contacted.
- Parents will be informed as soon as possible and kept updated on the progress of any investigation.



- If the member of staff concerned leaves their employment at Bright Sparks before the investigation is concluded, we will notify the Disclosure and Barring Service immediately

Confidentiality

- All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the appropriate local authority.
- Parents and staff involved in any investigation MUST ensure confidentiality.

Outcomes of an investigation

Below are the possible outcomes of an investigation and some information regarding our likely response in each case. Each case of allegation is viewed on an individual basis, our main point of contact and advice would be provided by the student's local authority's safeguarding team.

- Substantiated – there is sufficient evidence to prove the allegation that the child is suffering or at risk of suffering significant harm. In this circumstance, the local safeguarding team would refer the case to social care for consideration. The Police would also be involved. We would no longer be able to employ the member of staff and would seek to dismiss them. We would inform the DBS with immediate effect.
- Malicious – sufficient evidence to disprove the allegation and there is a deliberate act to deceive. We would refer the matter to the police if the allegation has been deliberately invented. Bright Sparks Tutors may also need to refer the child to social services as a 'child in need'
- False – sufficient evidence to disprove the allegation. In this instance Bright Sparks may need to refer the child to social services as a 'child in need'
- Unsubstantiated – insufficient evidence to either prove or disprove the allegation. This term, therefore, does not imply guilt or innocence. In this circumstance, we would decide whether Bright Sparks can reasonably continue to employ the member of staff. We would also inform the DBS of the outcome.

Disciplinary action

- Where a member of staff or a volunteer is dismissed from the setting because of misconduct relating to a child, we notify the DBS so that the name may be included on the Protection of Children and Vulnerable Adults Barred List. Training
 - We seek out training opportunities for all adults involved in the setting to ensure that they can identify and understand the signs and signals of possible physical abuse, emotional abuse, sexual abuse and neglect and that they know how to respond appropriately, confidentially and without delay.



- All staff receive an induction on how to whistle-blow if they have concerns regarding a colleague. (See Handbook)

Curriculum

- We introduce key elements of keeping children safe into our planning to promote the personal, social and emotional development (PSED) of all children, so that they may grow to be strong, resilient and listened to and that they develop an understanding of their rights, why and how to keep safe e.g. safe touch where appropriate.
- We ensure that this is carried out in a way that is developmentally appropriate for the children.
- We create a culture of value and respect for the individual, having positive regard for children's heritage arising from their colour, ethnicity, languages spoken at home, cultural and social background

Support to families

- We believe in building trusting and supportive relationships with families. This process begins with our initial consultation.
- We make clear to parents our role and responsibilities in relation to child protection, such as for the reporting of concerns, providing information, monitoring of the child, and always liaising with the local children's social care team
- We will continue to provide tuition to the child whilst investigations are being made in relation to any alleged abuse.

Risk Assessment

If staff have concerns for the welfare of a child they should contact Kayleigh Rapson (DSL) or the child's local authority safeguarding team. This can be found by searching 'safeguarding team' and the child's location into an online search engine.

Female Genital Mutilation

The UK government has written advice and guidance on FGM that states: 'FGM is a grave violation of human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the convention on the Rights of the Child'. 'Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they are at risk of undergoing FGM. UK communities that are most at risk of FMG include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerian and Eritreans. However, women from non- African communities that are also at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.'



Indications that a child is at risk from FGM:

- The family comes from a community that is known to practice FGM- especially if there is an elderly lady present.
- In a conversation a child may talk about FGM
- A child may express anxiety about a special ceremony.
- A child may express concern/anxieties about a forthcoming holiday to their country of origin.
- Bright Sparks Tutors are made aware that the family are travelling for holidays for a substantial amount of time.
- If a woman has already gone FGM- and it comes to the attention of any professional, consideration needs to be given to any child protections implications e.g., for younger siblings, extended family members and a referral made to Social Care of the Police if appropriate. If we have any concerns about children being at risk or victims of FGM then we refer to the child's local authority and safeguarding team.