

# SAFEGUARDING AND CHILD PROTECTION PROCEDURES

For tutors, subcontractors, partner schools and parents/carers

Effective 1 September 2026 | Review date: September 2027

|                              |                                                                   |
|------------------------------|-------------------------------------------------------------------|
| Organisation                 | The Community Schools CIC                                         |
| Company number               | 14658587                                                          |
| Registered office            | Office 211, Epicentre, Enterprise Way, Haverhill, England CB9 7LR |
| Policy owner                 | Claire Meadows-Smith - Principal                                  |
| Designated Safeguarding Lead | Hayley Coull - admin@thecommunityschools.co.uk                    |
| Deputy DSL                   | Claire Meadows-Smith -<br>claire@thecommunityschools.co.uk        |
| Safeguarding oversight       | Wendy Meadows-Smith - Director of Online Learning                 |

These procedures explain what to do when there is a safeguarding concern. They apply to all in-person and online tutoring delivered by The Community Schools CIC, including tuition delivered by employees and subcontractors. The child's best interests must remain central. The procedures are aligned with Keeping Children Safe in Education 2026, Working Together to Safeguard Children and the Department for Education's safeguarding guidance for out-of-school settings, including private tuition.

## 1. Key contacts, immediate action and out-of-hours safeguarding

DSL: Hayley Coull - admin@thecommunityschools.co.uk.

Deputy DSL: Claire Meadows-Smith - claire@thecommunityschools.co.uk.

If a child is in immediate danger, a serious crime is occurring, or urgent medical help is needed, call 999. Do not wait for the DSL or Deputy DSL.

For non-emergency police advice, contact 101. For child-protection concerns requiring statutory advice or referral, the DSL/Deputy DSL should use the current children's social care or safeguarding route for the child's home local authority. The Community Schools CIC will maintain a live local-authority safeguarding contact directory within the administration system, linked to each student's home area.

Because tuition takes place during evenings, weekends and school holidays, tutors must not allow the absence of the DSL or Deputy DSL to delay protective action. If neither is available and a child may be at risk of significant harm, the tutor should contact the child's local authority children's social care/emergency duty service directly, or the police where appropriate, and record the action taken. NSPCC professional safeguarding advice may also be used where appropriate.

A tutor who reasonably believes a child is at risk and considers that the DSL/Deputy DSL has not acted appropriately may make a referral directly to children's social care or the police. The tutor must then record the referral and inform the DSL as soon as it is safe and appropriate to do so.

## 2. If a student makes a disclosure

- Listen carefully and calmly; take the child seriously.
- Use an appropriate setting that protects privacy but avoids unnecessary isolation.
- Do not investigate, interrogate or ask leading questions. Use only minimal open prompts needed to clarify what the child is saying.
- Do not promise confidentiality. Explain that information must be shared with people who can help keep them safe.
- Reassure the child that they have done the right thing by telling someone.

The Community Schools CIC is a **not-for-profit cooperative** of qualified teachers dedicated to providing safe and affordable access to the highest quality tutoring according to needs that are not properly satisfied by the education system.

- Listen to and, where appropriate, record the child's wishes and feelings, while making clear that safeguarding action may still be necessary.
- Make a factual record as soon as possible and on the same day: date/time, people present, what was said, the child's own words where possible, observations, wishes and feelings, and what action you took.
- Submit the concern through the secure safeguarding notification process on our administration system on the same day and alert the DSL/Deputy DSL immediately where the concern is urgent.
- Do not contact an alleged perpetrator or conduct your own investigation.

### **3. If a tutor notices signs or has a concern**

A concern may arise from behaviour, appearance, attendance, comments, online activity, changes in presentation, mental-health indicators, possible neglect, exploitation, domestic abuse, bullying, child-on-child abuse or other information. Record facts rather than assumptions and submit the concern on the same day.

The DSL/Deputy DSL will review urgent safeguarding concerns as soon as practicable and normally on the same day. Where the threshold for referral to children's social care is met, the referral should be made the same day. Immediate threats to life or serious injury require emergency action without waiting for internal review.

Mental-health concerns can be safeguarding concerns where they indicate abuse, neglect, exploitation or risk of significant harm.

### **4. Concerns or allegations about a tutor or other adult**

Report allegations or safeguarding concerns about an adult immediately to Claire Meadows-Smith, Principal, and the DSL. If the concern relates to the Principal or DSL, report it to another director and, where appropriate, directly to the relevant Local Authority Designated Officer (LADO). Do not investigate the allegation yourself or alert the subject in a way that could compromise safeguarding action.

The organisation will obtain appropriate LADO advice where the allegation threshold may be met. Low-level concerns that do not meet that threshold will still be recorded and reviewed for patterns. Suspension is not automatic; protective action will be based on risk and professional advice.

DBS referral duty. Where The Community Schools CIC is a regulated activity provider and the statutory conditions are met, it will make a referral to the Disclosure and Barring Service (DBS). This includes where a person is removed from regulated activity, or would have been removed had they not resigned, retired or otherwise ceased the activity, because of relevant conduct, risk of harm or another applicable statutory ground. A resignation or settlement does not remove the duty to consider and, where required, make the referral.

Teaching Regulation Agency. Because tutors are QTS-qualified teachers, the organisation will also consider whether alleged serious teacher misconduct should be referred to the Teaching Regulation Agency (TRA), independently of any LADO, police, children's social care or DBS process.

No settlement agreement, confidentiality clause or non-disclosure agreement may prevent or discourage a lawful safeguarding disclosure, referral to the LADO, children's social care, police, DBS or TRA, protected disclosure, or cooperation with a safeguarding or regulatory investigation.

### **5. Working with partner schools and local authorities**

For students referred or funded by a partner school or local authority, the commissioning body's DSL/safeguarding contact details and any additional safeguarding requirements should be known before tuition begins where practicable. Concerns should be shared promptly with the relevant safeguarding contact when appropriate.

The Community Schools CIC remains responsible for taking necessary safeguarding action and will not delay an urgent statutory referral while waiting for a school, local authority or commissioner to respond.

Data protection law does not prevent the proportionate sharing of information needed to safeguard a child. Staff should follow current government information-sharing advice for safeguarding practitioners and record what was shared, with whom, why and when.

## 6. Parents/carers raising concerns

Parents/carers may raise a welfare concern with the tutor, DSL or administration team. The tutor should listen, record the facts and pass the concern to the DSL without attempting to investigate. Confidentiality cannot be promised where a child's safety may be affected.

## 7. Safer recruitment and central safeguarding records

- All tutors, whether employees or subcontractors, must complete the same core safer-recruitment and safeguarding checks before unsupervised work begins.
- All tutors must hold QTS. QTS and identity are verified and the teacher's record is checked for any applicable prohibition or restriction.
- Identity, right to work and teaching qualifications are checked.
- Full employment history is obtained and relevant gaps or inconsistencies are explored.
- Appropriate references are obtained and verified directly with the referee.
- An enhanced DBS certificate with children's barred-list information is required where the tutoring role is regulated activity and the organisation is legally entitled to obtain that level of check. A person known to be barred must never be engaged in regulated activity.

**Where a tutor is subscribed to the DBS Update Service, The Community Schools CIC carries out a status check before unsupervised work begins and thereafter conducts daily DBS Update Service status checks, where the organisation is legally entitled to do so and the tutor has provided the required consent. Any change in certificate status is escalated immediately and the tutor will not undertake unsupervised tutoring pending appropriate safeguarding review.**

- Appropriate overseas criminal-record or equivalent checks, such as a certificate of good conduct where available, are considered for applicants who have lived or worked abroad, alongside the other required checks.
- An online search is carried out on shortlisted candidates as part of due diligence, proportionately and with attention to information relevant to suitability to work with children.
- Shortlisted candidates complete a suitability/self-declaration covering relevant safeguarding, disciplinary and criminal-history matters that may lawfully be requested.
- At least one person involved in each appointment decision must have completed appropriate safer-recruitment training.
- Safeguarding and recruitment checks, dates and outcomes are recorded on the organisation's central safeguarding/recruitment record before unsupervised work begins.

## 8. Tutor Code of Conduct - core safeguarding expectations

- Maintain a professional tutor-student relationship and clear boundaries.
- Use Community Schools-approved business communication channels; do not exchange personal contact details with students.
- Do not connect with students through personal social-media accounts.
- Use approved tutoring platforms and follow online-safety arrangements.
- Do not make or share unauthorised recordings, screenshots or images.
- Treat students fairly and respectfully and make reasonable adjustments where appropriate.

- Never complete assessed work dishonestly for a student or encourage dependency on tutoring.
- Keep safeguarding information confidential except where it must be shared to protect a child.
- Report safeguarding concerns, allegations and low-level concerns in accordance with these procedures.

## 9. Online tuition

Tutors should conduct online sessions from a suitable professional environment, use the approved platform and approved accounts, and ensure no unauthorised person can see or hear confidential student information. Any unexpected person, inappropriate content, concerning behaviour or online-safety incident must be managed and reported.

Online sessions are recorded in accordance with the Online Safety Policy and Privacy Policy. For group sessions, recordings containing more than one student's personal data are not made routinely accessible to individual students or families; any access request must be reviewed before disclosure. Recordings are normally deleted within 30 days after the student ceases to be current unless a safeguarding, complaint or legal hold requires longer retention.

## 10. Child-on-child abuse, sexual harassment and harmful behaviour

All child-on-child abuse is taken seriously, including bullying, sexual violence, sexual harassment, harmful sexual behaviour, abuse in intimate relationships, image-based abuse, coercion, exploitation, initiation/hazing and online abuse. It must not be dismissed as banter or an inevitable part of growing up.

Where an allegation concerns students in the same tutoring group, the DSL will complete and record a proportionate risk assessment. This will consider the needs and wishes of the child who may have been harmed, the alleged perpetrator and other affected children; whether they can safely remain in the same group; any immediate changes to tuition; what information can safely be shared with each family; and whether children's social care or police involvement is required. The approach will have regard to the principles in KCSIE Part Five where relevant.

## 11. Exploitation, online harm, radicalisation and Prevent

Tutors should remain alert to child sexual exploitation, criminal exploitation including county lines, grooming, trafficking, modern slavery, online coercion, financial exploitation, extremist influence and radicalisation. Concerns must be reported to the DSL.

For a Prevent-related concern, the DSL will consider the local Prevent referral route and whether the case may be appropriate for Channel, the multi-agency early-intervention programme. Advice can also be sought through the national police Prevent advice line. Immediate threats should be reported to the police.

## 12. Other specific safeguarding concerns and FGM

Tutors should be alert to domestic abuse, neglect, physical and emotional abuse, sexual abuse, so-called honour-based abuse, forced marriage, female genital mutilation (FGM), fabricated or induced illness, homelessness, missing education, substance misuse and other circumstances that may place a child at risk.

FGM mandatory reporting duty. A teacher in England or Wales who, in the course of professional duties, is informed by a girl under 18 that FGM has been carried out on her, or observes physical signs that appear to show FGM has been carried out and has no reason to believe it was medically necessary, has a personal legal duty to make a report to the police. This duty is not discharged merely by reporting the matter to the DSL. The teacher should follow the statutory FGM reporting procedure and also inform the DSL unless doing so would create a safeguarding risk.

## 13. Whistleblowing and right to escalate

Tutors should raise concerns about unsafe practice or failures in safeguarding with the Principal, DSL or another director. If internal reporting is inappropriate, delayed or the concern is not addressed, staff and subcontractors may use appropriate external whistleblowing or safeguarding channels. No person should suffer retaliation for raising a genuine concern or making a lawful safeguarding referral.

## **14. Recording, information sharing and retention**

Safeguarding records must be factual, dated, secure and accessible only to authorised people. They must not be placed in ordinary tutor notes or shared casually by email or messaging.

Safeguarding records will be retained in accordance with the Data Retention and Destruction Policy and any applicable statutory or safeguarding requirement. The ordinary one-month deletion rule for routine operational records does not apply where a safeguarding record must be retained for longer. A safeguarding hold must be applied where a concern, allegation, referral, complaint or legal process makes continued retention necessary.

## **15. Governance, training and review**

Tutors receive safeguarding induction and regular updates. Training includes disclosures, allegations against adults, child-on-child abuse, online safeguarding, information sharing, Prevent, FGM mandatory reporting, DBS referral awareness and escalation routes.

The Director with safeguarding oversight will receive periodic safeguarding assurance information and an annual safeguarding report covering training, safer recruitment, concerns and referrals, allegations/low-level concerns, online-safety issues, policy compliance and lessons learned, with personal information limited to what is necessary.

The Crime and Policing Act 2026 creates a mandatory reporting framework for child sexual abuse for individuals in relevant roles, including people carrying out regulated activity with children, together with provisions concerning obstruction of reports. The organisation will monitor commencement regulations and statutory guidance and will update these procedures and training before the duty comes into force. Internal processes must never be used to obstruct, discourage or improperly delay a lawful safeguarding report.

These procedures will be reviewed at least annually and sooner after significant guidance or legislative changes, incidents or learning. From 1 September 2026 they take account of KCSIE 2026, Working Together to Safeguard Children and the Department for Education's current safeguarding guidance for out-of-school settings.

## SAFEGUARDING CONCERN - ONE-PAGE ACTION FLOW

Use this page as a quick operational guide. It does not replace the full procedures.

|                                   |                                                                                                                                                                        |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. NOTICE / RECEIVE</b>        | A disclosure, observation, allegation, online incident or other concern arises. Listen; do not investigate.                                                            |
| <b>2. IMMEDIATE DANGER?</b>       | YES: call 999 and take proportionate action to protect the child. Do not wait for the DSL. NO: continue below.                                                         |
| <b>3. RECORD SAME DAY</b>         | Make a factual record using the child's own words where possible. Include date/time, people present, observations, wishes/feelings and action taken.                   |
| <b>4. SUBMIT / ALERT</b>          | Submit through the secure safeguarding process the same day. Alert the DSL/Deputy immediately where urgent.                                                            |
| <b>5. DSL DECISION</b>            | DSL/Deputy reviews urgent concerns as soon as practicable, normally the same day. If statutory threshold is met, refer to children's social care the same day.         |
| <b>6. OUT OF HOURS / NO DSL</b>   | Use the child's home local-authority children's social care/emergency duty route. If necessary contact police. Do not delay because internal contacts are unavailable. |
| <b>7. IF ACTION IS INADEQUATE</b> | Any tutor who reasonably believes a child remains at risk may refer directly to children's social care or police.                                                      |
| <b>8. ALLEGATION ABOUT ADULT</b>  | Report to Principal + DSL; if concern involves them, another director and/or LADO. Consider DBS and TRA referral duties. Do not investigate personally.                |
| <b>9. FGM KNOWN CASE</b>          | A teacher's personal statutory duty may require direct reporting to police. Follow the statutory FGM procedure; do not rely only on internal reporting.                |
| <b>10. RECORD OUTCOME</b>         | Record referrals, advice, decisions, information shared, follow-up and any safeguarding hold on records.                                                               |

The Community Schools CIC | Safeguarding and Child Protection Procedures | September 2026